

September 2020

SYON GARDENS

HOMEBASE BRENTFORD SITE, TW7 5QE

PLANNING STATEMENT

Consultant: WSP





St Edward Homes Limited

**SYON GARDENS HOMEBASE SITE
BRENTFORD, TW7 5QE**

Planning Statement

PUBLIC

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DATE: SEPTEMBER 2020



St Edward Homes Limited

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Planning Statement

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EXECUTIVE SUMMARY



The proposal is for the redevelopment of the Homebase site at Syon Lane, Brentford to deliver 473 residential units and a 10,550sqm replacement Tesco store with additional 137 sqm of commercial, business and service space and 200sqm of flexible community space (GIA) and ancillary plant, access, servicing and car parking, landscaping and associated works.

The site represents an important opportunity to deliver a sustainable residential-led mixed use development at the gateway to the Great West Corridor (GWC) Opportunity Area, alongside the creation of a mixed and inclusive community with an enhanced public realm, a high proportion of quality homes including affordable housing, a new modern and Tesco store, and a community facility it will create a new destination on the GWC.

There is a significant need for housing in the borough and in London as a whole and the redevelopment of the Homebase site would help deliver 473 new homes for Londoners, including 164 London Affordable Rent (LAR) units. There is also an under delivery of homes in the borough, which the proposed development would go towards addressing.

St Edward Homes Limited (St Edward), a joint venture between M&G Investments and Berkeley Group, is bringing forward the redevelopment of both the Tesco, Osterley and Homebase, Brentford sites. The two applications are subject of separate planning applications, but it is a factual reality that the schemes are interdependent and would be formally linked through their s106 agreements. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site. There would not be two Tesco stores open for trading at the same time on these sites, and planning



obligations are proposed to control this scenario and prevent this from taking place (Please refer to Planning Obligations submitted).

St Edward build homes and neighbourhoods with a focus on creating beautiful successful places across London and the South of England. The Berkeley Group has built a total of 19,660 homes and have a wealth of experience in delivering complex developments that provide much needed homes, community facilities and improvements to local infrastructure.

There is a unique opportunity to unlock the wider strategic development potential of the two sites and release of the 5.45-acre Tesco Osterley site for comprehensive redevelopment. This will deliver up to 1,677 additional quality new homes with around 725 affordable homes and associated commercial uses, as part of a mixed-use quarter, which will deliver a focal area for new and existing residents and workers.

The redevelopment of the Homebase and Tesco sites represents one of the largest regenerative opportunities in London Borough of Hounslow (LBH) with the capacity to make a substantial contribution towards the strategic target for 7,500 new homes and 14,000 jobs in the GWC Opportunity Area. Providing up to 2,150 new homes, it would deliver more than double the number of homes than any other development in LBH in at least the last 15 years. Importantly, with around 725 affordable homes the two schemes would also deliver around twice as many affordable homes as any other development in the last 15 years.

The reuse of previously developed land is supported by Paragraph 117 and 118 of the NPPF which promote the effective use of land, in particular, making as much as possible use of brownfield sites. The proposal also supports the aspirations of the Intend to Publish London Plan through optimising the potential for housing delivery on suitable brownfield sites in an accessible location close to the train station.

The principle of retail use on the site is considered an acceptable and sustainable use of the site and as it has been demonstrated will not result in significant adverse impact to the four town centres and neighbourhood centres in line with Paragraph 189 of the National Planning Policy Framework (NPPF) and Policy TC3 of the adopted Hounslow Local Plan.

The proposed scheme has been informed by extensive pre-application engagement with the LBH, Historic England, the Greater London Authority (GLA) and Transport for London (TfL). The GLA expressed support for the scheme as it would make a significant contribution towards meeting local and strategic targets through a higher density scheme, and strongly supported the comprehensive redevelopment of a low density out of town warehouse site and associated surface car park.

Following feedback received from LBH and TfL, a vast number of transport improvements will be incorporated into the scheme. A new clean air route and an improved pedestrian environment is proposed along Syon Lane, Great West Road and Syon Gate Way. The development will provide two new car club spaces and improvements to bus services and bus stops. Cycle parking and residential parking will be provided in accordance with the requirements of the Intend to Publish London Plan. The amount of retail car parking has been agreed with Tesco and statutory consultees and has been minimised to provide no more retail parking than is required for operational and viable commercial purposes. Cumulatively, the strategic opportunity presented by the two schemes will result in substantial overall reduction in retail car parking compared with the existing situation.

A number of public consultation events and community liaison group meetings and an online consultation platform has allowed St Edward to engage with more local people in the area to help shape the development. The proposed development has sought to respond positively to all comments that have been made to date.

There have been ongoing design improvements to the scheme, taking into consideration the comments received but also with a view of optimising the development potential of the site and recognising the strategic opportunity. The evolution of the scheme has had regard to the historic context in particular the setting of the adjacent listed buildings including Gillette Tower and Registered Historic Parks and Gardens such as Syon and Osterley Park. It has also had regard to the nearby residential dwellings, in particular the adjacent



properties at Northumberland Gardens. There is a clear challenge in achieving this kind of step change on the Homebase site whilst also respecting the existing historic and neighbouring context. The project team have worked hard to balance the planning and heritage considerations to achieve this sustainable development.

A significant level of development is expected to come forwards within GWC as promoted in the emerging GWC Local Plan Review, changing the surrounding development context and skyline, with many strategic developments already consented and in the pipeline. This includes many high-density schemes and tall buildings.

It is argued through this Planning Statement that the height and density is justified by the ability to deliver the public benefits that would not be feasible with a smaller scheme, these benefits includes a modern and more energy efficient Tesco store, 473 new homes of which 38% will be LAR affordable, a new landmark building to mark the entrance to the GWC, new active frontages and improved public realm, net biodiversity gain within the communal podium gardens, new and safer pedestrian routes and cycle lanes.

We consider that the substantial and wide-ranging benefits associated with the proposed development, as identified in the Statement and the supporting documents, would significantly outweigh any adverse impacts. When assessed against the policies in the Framework taken as a whole, the proposed development constitutes sustainable development.

1

INTRODUCTION



1 INTRODUCTION

- 1.1.1. This Planning Statement has been prepared by WSP on behalf of St Edward in support of the proposed scheme for the residential-led mixed-use development of the Homebase site at Syon Lane, Brentford, TW7 5QE.
- 1.1.2. It is submitted to the London Borough of Hounslow (The LPA) as part of the application submission for the following:
- “Full planning application for the demolition of existing building and car park and erection of buildings to provide residential units, a replacement retail foodstore, with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking, landscaping and associated works”*
- 1.1.3. This Planning Statement assesses the proposed scheme against the adopted and emerging development plan and other material planning considerations.
- 1.1.4. This Planning Statement, should be read in conjunction with the other supporting information submitted which comprises:
- ▮ Planning application form, signed and dated, prepared by WSP;
 - ▮ Community Infrastructure Levy information form, signed and dated, prepared by WSP;
 - ▮ Draft S106 Heads of Terms;
 - ▮ Cover Letter (including LLD Monitoring Form), prepared by WSP;
 - ▮ Site Location Plan, prepared by Patel Taylor;
 - ▮ Full set of application drawings (existing and proposed, as listed in **Appendix 1**), prepared by Patel Taylor;
 - ▮ Landscape Strategy (as listed in **Appendix 1**), prepared by Murdoch Wickham;
 - ▮ Design and Access Statement, prepared by Patel Taylor;
 - ▮ Flood Risk Assessment, Drainage Report & Drainage Assessment Form prepared by AECOM and Waterman;
 - ▮ Retail/ Town Centre Use Assessment, prepared by WYG;
 - ▮ Statement of Community Involvement, prepared by Soundings;
 - ▮ Transport Assessment (including Road Safety Audit, ATZ Route Assessment), prepared by RHDHV;
 - ▮ Framework Workplace Travel Plan, prepared by RHDHV;
 - ▮ Residential Travel Plan, prepared by RHDHV;
 - ▮ Car Park Management Plan, prepared by RHDHV;
 - ▮ Delivery & Servicing Plan, prepared by RHDHV;
 - ▮ Outline Construction Logistics Plan, prepared by RHDHV;
 - ▮ Energy Statement, prepared by Hodkinson;
 - ▮ Sustainability Statement, prepared by Hodkinson;
 - ▮ Ecological Assessment and Biodiversity Report, prepared by Derek Finnie Associates Ltd;
 - ▮ Geo-Environmental Assessment, prepared by Waterman;
 - ▮ Arboricultural Assessment, prepared by TreeFabric;
 - ▮ Waste and Recycling Management Plan, prepared by AECOM;
 - ▮ Heritage Statement, prepared by KM Heritage;

- ┆ Environment Impact Assessment prepared by Barton Willmore, including technical chapters on:
 - Construction Methodology and Phasing
 - Population and Human Health
 - Built Heritage
 - Townscape and Visual Effects
 - Transport & Access
 - Noise and Vibration
 - Air Quality
 - Daylight, Sunlight and Overshadowing and Solar Glare
 - Wind Microclimate
- ┆ Health Impact Assessment, prepared by Barton Willmore;
- ┆ Fire Strategy, prepared by International Fire Consultants Ltd;
- ┆ Design and Construction Method Statement and Construction Environmental Management Plan, prepared by St Edward; and

The remainder of the Planning Statement is set out as follows:

- ┆ **Section 2:** outlines the strategic opportunity arising from the two sites (Homebase, Brentford and Tesco, Osterley) becoming available for redevelopment;
- ┆ **Section 3:** describes the development site, site designations and planning history;
- ┆ **Section 4:** describes the proposed development;
- ┆ **Section 5:** provides a summary of the pre-application engagement and public consultation to date;
- ┆ **Section 6:** sets out the relevant planning policy framework and guidance;
- ┆ **Section 7 to 19:** assesses the proposed development against relevant planning policies having regard to other material considerations; and
- ┆ **Section 20:** sets out our summary and conclusions.

1.1.5. As noted in the preceding section in the Executive Summary, St Edward Homes Limited is bringing forward the redevelopment of both the Tesco Osterley and Homebase Brentford sites. The two applications are subject of separate planning applications, but it is a factual reality that the schemes are interdependent and would be formally linked through their s106 agreements. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site. There would not be two Tesco stores open for trading at the same time on these sites, and planning obligations are proposed to control this scenario and prevent this from taking place (see Planning Obligations submitted).

1.1.6. Therefore, whilst this Planning Statement primarily assesses the Homebase, Syon Lane development in isolation, in some sections it has been necessary to consider the two developments together. This applies to:

- ┆ Affordable housing;
- ┆ Retail impact;
- ┆ Jobs and economic impact;
- ┆ Townscape and heritage; and



i Transport and parking.

2

STRATEGIC OPPORTUNITY



2 STRATEGIC OPPORTUNITY

- 2.1.1. There is a pressing need for new homes in the London Borough of Hounslow and London-wide. The adopted London Plan 2016 sets Hounslow's minimum ten-year target at 8,222 new homes, equivalent to 822 per year, and the Intend to Publish London Plan 2019 increases this by 117% to 17,820 new homes, equivalent to 1,782 per year.
- 2.1.2. The Homebase Brentford site is located within the Great West Corridor Opportunity Area, which was promoted in the adopted Hounslow Local Plan 2015 and is designated in the Intend to Publish London Plan. The Intend to Publish London Plan identifies the Great West Corridor as one of London's key approaches, which presents unique opportunities for place-making, and sets targets of 7,500 new homes and 14,000 new jobs.
- 2.1.3. LB Hounslow's emerging Great West Corridor Local Plan Review 2019 sets out the Council's vision and plan for how the area, known as the Golden Mile, will grow and develop over the next 15 years to meet the much-needed housing and jobs. This area has a rich history associated with industry and is now home to several high-profile employers as well as office and industrial parks. However, as the Great West Corridor Local Plan Review identifies, the residential areas are not well integrated, lacking accessibility and permeability, and whilst the area has strong location advantages and assets, it currently fails to generate a sense of place or positive identity.
- 2.1.4. As a result, the emerging policies in the Great West Corridor Local Plan Review are aimed at not only delivering new homes and new jobs (taking the Intend to Publish London Plan targets and proposing to go further with a baseline of 7,500 new homes and a high of 9,000; targeting 3,000 affordable homes; and 17,600 new jobs), but also at placemaking. The vision seeks to achieve 'good growth' by balancing economic development with a high-quality environment, sustainable transport solutions, a vibrant mix of uses, good integration with its surrounding communities, and a strong image and identity.
- 2.1.5. Making the most out of the key opportunity sites within the Opportunity Area will be essential to achieving this vision. At the western end of the Opportunity Area, the Great West Corridor Local Plan Review identifies two large sites for residential-led mixed-use development. One of these, to the south of the Great West Road, is the Homebase Brentford site, the application site. The second, to the north of the Great West Road, is the Tesco Osterley Both are under-utilised sites containing a single-storey large format retail store and extensive surface level car parking.
- 2.1.6. St Edward Homes Limited (St Edward), a joint venture between M&G Investments and Berkeley Group, is bringing forward the redevelopment of both the Tesco, Osterley and Homebase, Brentford sites. The two applications are subject of separate planning applications, but it is a factual reality that the schemes are interdependent and would be formally linked through their s106 agreements. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site. There would not be two Tesco stores open for trading at the same time on these sites, and planning obligations are proposed to control this scenario and prevent this from taking place (see Planning Obligations submitted).

Figure 2-1. Tesco, Osterley and Homebase, Brentford sites Source: Capital West London



- 2.1.7. St Edward builds homes and neighbourhoods with a focus on creating beautiful successful places across London and the South of England. The Berkeley Group has built a total of 19,660 homes and has a wealth of experience in delivering complex developments that provide much needed homes, community facilities and improvements to local infrastructure.
- 2.1.8. St Edward is uniquely placed to bring forward the redevelopment of these two sites at the western gateway to the Golden Mile in a way which delivers on the placemaking vision set out in the Great West Corridor Local Plan Review.
- 2.1.9. With 473 new homes proposed at Homebase Brentford above the re-provided Tesco store, and up to 1,677 new homes proposed at Tesco Osterley, with a combined delivery of 36% affordable housing across both sites, these two developments represent a strategic opportunity to make a substantial contribution towards delivering the vision for the Great West Corridor.
- 2.1.10. Together, these two developments represent:
- ❑ **2,150 new homes, more than double the number of homes than any other development in LB Hounslow in the last 15 years;**
 - ❑ **29% of the homes to be delivered across the whole Great West Corridor Opportunity Area;**
 - ❑ **12% of LB Hounslow’s ten-year housing requirement in the Intend to Publish London Plan;**
 - ❑ **Around 725 new affordable homes, more than twice as many affordable homes as any other development in Hounslow in the last 15 years;**
 - ❑ **Equivalent of three and half years of the recent Borough-wide provision of affordable homes (an average of around 200 homes per year); and**
 - ❑ **The creation and retainment of over 600 jobs.**

2.1.11. Beyond the numbers, there is also an opportunity to respond to the LB Hounslow's placemaking vision for new residential neighbourhoods which are connected and more permeable and contribute to a sense of place and identity. The table below summarises key elements of the vision for the Homebase Brentford site in the Great West Local Plan Review and how the proposed development has responded.

Table 2-1: Vision and development summary

The Council's Vision	Homebase Brentford development
<ul style="list-style-type: none"> Residential-led mixed-use development (Figures 4.1 and 5.4), and the successful and sensitive co-existence of residential, retail and business uses (GWC1 and GWC2); 	<ul style="list-style-type: none"> 473 new homes, including 38% affordable and with a mix of sizes, as well as 10,550sqm new replacement Tesco store, 200sqm of community space and 137sqm of flexible retail/office space.
<ul style="list-style-type: none"> A focal area with new retail frontages (Figures 4.1 and 5.4), providing local shops and facilities (and 4.3); 	<ul style="list-style-type: none"> The creation of a new and inviting entrance to the Tesco store with the new Tesco entrance being a focal point at this landmark site.
<ul style="list-style-type: none"> To create vibrancy and buzz through a mix of uses and active frontages and enhance and establish a sense of place through strengthening special characters, heritage assets and landscape features; 	<ul style="list-style-type: none"> A new distinctive character with the vibrancy of the new mix of uses and wider public realm enhancements leading up to the site.
<ul style="list-style-type: none"> Enhancing opportunities for relaxation, recreation and a healthy lifestyle, and maximising opportunities for tree planting and greening (GWC4); 	<ul style="list-style-type: none"> A new podium level garden will provide high-quality communal amenity space for future occupiers including areas of play, socialising and seating. Biodiversity improvements and tree planting proposed throughout landscaping masterplan including wildflower meadow and native species planting.
<ul style="list-style-type: none"> Increasing permeability and delivering a network of clean air routes (Figure 4.7, GWC6 and P1) 	<ul style="list-style-type: none"> New calm and attractive pedestrian connections to and from the site, away from nearby roads, including an enhanced pedestrian and cycle clean air routes.
<ul style="list-style-type: none"> Responding to the area's heritage (GWC5); 	<ul style="list-style-type: none"> A layout that opens up to celebrate views of the local landmark of the Gillette Tower, incorporating an art deco style inspired by the rich local history of buildings along the Golden Mile.
<ul style="list-style-type: none"> Improving public transport provision and bus services 	<ul style="list-style-type: none"> Facilitating the improvement of bus services and encourages sustainable modes of transport throughout the life of development

	as well as in demolition and construction stages.
<ul style="list-style-type: none"> Improving pedestrian crossings across the Great West Road (P1); 	<ul style="list-style-type: none"> Delivering improvements to the links between the site and both Syon Lane station and the Tesco Osterley development, including improvements to the pedestrian environment and existing underpass.

2.1.12. This Planning Statement demonstrates that, as well as responding to the strategic opportunity and delivering the Council’s vision, the proposed development is in compliance with the development plan, is supported by relevant material considerations, and constitutes sustainable development.

3

SITE DESIGNATIONS AND PLANNING HISTORY



3 SITE DESIGNATIONS AND PLANNING HISTORY

THE APPLICATION SITE

- 3.1.1. The Homebase site is a rectangular plot of land located on the corner of Syon Lane and the Great West Road at Gillette Corner. It has an area of approximately 1.4 hectares (ha).
- 3.1.2. The site is developed with a large Homebase store (4,180sqm) and associated surface car parking and under-croft car parking (295 spaces). The Homebase store comprises of a large industrial style shed with metal cladding. The building is effectively two storeys high with a central pylon to the front.
- 3.1.3. There are limited areas of soft landscaping areas within the site boundary; these are located to the north and west of the site. A band of deciduous trees infilled with shrubbery is located in the north of the site along the Great West Road and to the west of the Site along Syon Lane, however, this is of a low quality and is poorly maintained.
- 3.1.4. In terms of topography, the site slopes from the Great West Road to the north, down towards the Site's southern boundary towards the railway line. There is around a 4m level drop from the north-west corner of the Site to the south of the Site.
- 3.1.5. An image of the Homebase site is included below:

Figure 3-1: Homebase Site, Source: WSP



- 3.1.6. The primary vehicle access is from a wide junction off Syon Lane to the west of the Site. It currently provides access to the Homebase store car park and delivery area, as well as to the undercroft car park. Pedestrian access is also available on Syon Lane at the same point as the vehicular access, and to the at the north of the Site from the Great West Road.

- 3.1.7. The site is bound by the A4 Great West Road to the north, and Syon Lane to the south-west. There is a car showroom to the east, and a service road, Syon Gate Way which extends along the south-eastern boundary, and further along is the railway line.
- 3.1.8. The site is 400m from the nearest small neighbourhood centre at 1-9A Spur Road and 142-156 London Road which south-east of the Tesco Osterley Site. St Johns Road Neighbourhood Centre is around 2km to the south of the site. The site is also approximately 900 metres west from Brentford Town Centre and over 2km east from Hounslow Town Centre.
- 3.1.9. The Homebase, Brentford store is approximately 260 metres from the Tesco, Osterley site.
- 3.1.10. The site has a public transport accessibility rating of PTAL 2/3. The southern part of the site falls into a PTAL 3 area, due to its proximity to bus services on London Road.
- 3.1.11. Syon Lane station is located within 100m of the site and is in Zone 4 providing National Rail services direct to London Waterloo, Richmond and Weybridge. Furthermore, Osterley Station provides access to the Piccadilly line service and is within 2km of the site.
- 3.1.12. There are bus stops directly adjacent to the site on A4 Great West Road and Syon Lane within 50m. Bus stops on London Road, adjacent to Syon Park are also accessible to the site, approximately 600m south of the site.
- 3.1.13. The site is well served by bus routes with seven regular bus services within walking distance of the site. The H28 bus route runs along Syon Lane and stops and turns around at Tesco Osterley. The H91 can be accessed from the A4 at bus stops K/C respectively and serves destinations which include Chiswick, Hammersmith and Hounslow Town Centre.
- 3.1.14. All of the site area is within Flood Zone 1 and there are limited areas of low to high risk of surface water flooding located around the perimeter of the existing Homebase Store. The River Thames is located approximately 1.6km to the south-east of the site.
- 3.1.15. The Site is located within the Hounslow Air Quality Management Area (AQMA) for nitrogen dioxide, owing to vehicular sources, declared in 2006. This means that levels of nitrogen dioxide exceed national objective levels for this pollutant. This AQMA encompasses the entirety of the borough of Hounslow.

SURROUNDING CONTEXT

- 3.1.16. The GWC is a major commercial area that follows the A4 and M4 corridors between Brentford and Chiswick, known as the 'Golden Mile'. The area has been subject to significant change in the past and there is significant development coming forward as a result of the emerging Opportunity Area and the Council's vision to transform the corridor.
- 3.1.17. To the north-west of the site, is the Sky Campus which comprises a 14ha hub of broadcasting, television and media production activities which is accessed from Grant Way and this falls within the wider Great West Road Strategic Industrial Location (SIL). This site is subject to outline and detailed planning permission which will result in a new media broadcasting and production campus which includes Sky Studios.
- 3.1.18. The immediate surrounding area comprises a mix of uses including commercial and residential development. There are semi-detached houses on the western side of Syon Lane, opposite the site. Along the Great West Road there is a variety of commercial and industrial uses as well as some residential uses, and further along Syon Lane the uses are predominantly residential.

- 3.1.19. The appearance of the townscape is reflective of the areas former industrial use with a number of large-scale big box industrial and office parks which were designed to be visible from the important transport corridors. Some of the area's tall buildings and local landmarks date back to the early development of the GWC, including the Gillette Building.
- 3.1.20. As set out in the relevant history below, the GWC is undergoing a new stage of revitalisation, with major residential led mixed-use developments of a high density and scale permitted and currently under construction, including Brentford Football Club and the Capital Interchange site.

Figure 3-2 - View of the Site from the Great West Road looking south, Source: WSP



- 3.1.21. The Homebase store is not statutorily or locally listed and is not within a conservation area, however, there are listed buildings nearby symbolising the industrial history of the area including the Grade II art deco Gillette Building located across the Great West Road and the Grade II NatWest Bank. Nearby to the north east of the Site, is another Grade II Listed Building (former Coty Factory), now used as the Syon Clinic (Figure 3).
- 3.1.22. On 3 December 2019, a Certificate of Immunity was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, as the Secretary of State does not intend to list this building to which the notice relates for a period of five years.
- 3.1.23. The wider surrounding context also includes a number of designated heritage and landscape areas. To the west, is Osterley Park, a Registered Historic Park and Garden, which includes Grade I listed Osterley House. Similarly, Syon Park to the south is a registered Historic Park and Garden, which coincides with the Isleworth Riverside Conservation Area. Kew Gardens World Heritage Site is situated further south-west on the other side of the River Thames. To the north, Boston Manor Park falls within the Great Union Canal and Boston Manor Conservation Area and Grade I Listed Boston Manor House.

3.1.24. A designated Area of Special Character is located to the south west of the Site at as described in Hounslow's Urban Context and Character Study (2014).

DESIGNATIONS

- 3.1.25. The site itself is not designated or allocated for any use in the adopted Hounslow Local Plan. Although it is located within the GWC Opportunity Area within The Intend to Publish London Plan and emerging GWC Local Plan Review Pre-Submission Regulation 19 Consultation Document.
- 3.1.26. The Homebase site is allocated in the emerging Site Allocations Local Plan Review Pre-Submission Consultation Document for the following minimum development quantum, including provision for a mixed-use development comprising a large format retail unit, associated parking and residential development.
- 3.1.27. The minimum development quantum is set out below (based on the old Use Classes Order):

Homebase, Syon Lane (Site 11)

- i Business (B1a/b), Residential (C3) and Retail (A1- A4) or Large format Retail (A1) and Residential (C3);
- i Residential Units (C3): approximately 340 units;
- i Retail (A1-A4) - 2750sqm;
- i Business (B1a, B1b) – 6910sqm; and
- i Parking (Sqm) 4880.

PLANNING HISTORY

3.1.28. As set out in the planning history below the site was occupied by from the 1960's Isleworth Wineries and later Allied Breweries. As shown in the image below the breweries had extensive site coverage.

Figure 3-3 - Homebase Site, 1960-1987, Source: Britain from Above



- 3.1.29. The breweries were demolished in the 1980s and the Homebase Store was erected in 1987. This Homebase store was specifically designed for a named occupier and their operational requirements.
- 3.1.30. The site is currently occupied by the trading Homebase store. However, in 2018 Homebase entered into CVA which will lead to the closure of 42 stores across the UK.
- 3.1.31. This site was identified for closure and has since terminated its long-term lease; however, it continues to trade on a short-term basis and continues to employ 35 full time staff.
- 3.1.32. The relevant planning history for the site is summarised below:
- i Planning permission was granted on 2 June 1965 (LPA ref. 00505/H/P1) for the erection of an extension to form covered area with offices (55 sqft) and to install two underground fuel tanks;
 - i Planning permission was granted on 22 November 1965 (LPA ref. 00505/H/P2) for the erection of a first-floor office extension, new store and garage buildings and loading bay canopy and to form new access to Syon Lane;
 - i Planning permission was granted on 22 February 1966 (LPA ref. 00505/H/P3) for the conversion of the building to provide additional offices and toilets;
 - i Planning permission was granted on 1 July 1970 (LPA ref. 00505/H/P9) for the erection of extension to link winery with warehouse;
 - i Planning permission was granted on 22 September 1970 (LPA ref. 00505/H/P10) for the construction of enclosed conveyor bridge between production and storage buildings;
 - i Planning permission was granted on 10 December 1987 (LPA ref. 00505/H/P16) for the erection of a DIY retail store and garden centre with associated parking facilities; and
 - i Planning permission was granted on 26 January 2001 (LPA ref. M01106/V/P1) for the variation of Condition 4 (parking, loading and turning spaces) of approved planning permission reference no. 00505/H/P16.

EMERGING PLANNING CONTEXT

- 3.1.33. The GWC is experiencing a period of change and there have been a number of major residential applications of a high density and scale that are relevant which are either going through planning, or recently approved and construction started including, but not limited to the following:
- i **1-4 Capital Interchange Way, Brentford, TW8 0EX** - Planning permission was approved on 23 March 2020 (LPA ref. P/2018/4117) for the redevelopment of the site to provide a mixed-use scheme comprising 420 residential units and flexible retail and commercial floorspace in buildings up to 16 storeys in height.
 - The scheme is relevant to the Homebase scheme given its height and massing as well as the density of residential accommodation. It is also similar in the sense that the site is subject to a number of environmental constraints (in particular noise, air quality and visual amenity) from the M4 and railway and has had to balance these conflicting risks.
 - i **Citroen Site, Brentford, Interchange Way, TW8 0EX.** - The Mayor of London directed that planning permission be granted on 22 August 2018 however this was called in by the Secretary of State on 15 April 2019 (LPA ref. P/2017/4692) for the redevelopment of the site to provide a mixed use scheme of 441 residential units and ancillary facilities and flexible uses, comprising buildings of 12-18 storeys. The Public Inquiry was held in January and February 2020. The Secretary of State approved the appeal on 10 September 2020.

- The scheme is relevant to the Homebase scheme given its scale, massing and density and it includes buildings up to 18 storeys. Less than substantial harm was identified to the significance of the nearby listed Orangery at Kew World Heritage Site, and nearby conservation areas and associated listed buildings, but these were weighed against the public benefits including housing and specifically affordable housing. The Citroen site would deliver a similar level of homes and affordable homes to the Homebase site, but this does not have the added benefit of the strategic opportunity of the Tesco Osterley site brought forward at the same time, which will deliver a combined offer of around 725 affordable dwellings.
- **Brentford Police Station, Half Acre, Brentford TW8 8DH** - Hounslow recommended planning permission be granted on 8 February 2018 (LPA ref. P/2017/3371) for the demolition of the existing former police station to provide a new arts centre and 105 new dwellings within a building of part six, part seven storeys. This application is linked with the below application and it is intended that the two are linked via a S106 Agreement.
- The above scheme would be delivered in conjunction with the proposals for the **Albany Riverside site, 40 and 40A High Street, Brentford, TW8 0DS** (LPA ref. P/2017/3372) for the demolition of the existing office build and arts centre to provide 193 new dwellings, part six, part seven story. Planning committee resolved to grant planning permission on 8 February 2018 and the Mayor subsequently advised he was content subject to referral to the Secretary of State. The Secretary of State confirmed his decision to call in the application on 15 April 2019 (PINS ref. APP/F5540/V/19/3226900) and the Public Inquiry has been delayed.
- By itself, the scheme delivers 57% (60 units) affordable housing, but when considered with the linked Albany Riverside scheme (no affordable housing proposed) below, the schemes together deliver 20% affordable housing across the two sites. The Homebase site and Tesco site combined will deliver 36% affordable housing, which equates to around 725 units across the two sites.
- The linked Brentford Police Station and Albany Riverside schemes are relevant to the Homebase and Tesco proposals as they are linked proposals which reflect a strategic planning opportunity for Hounslow albeit the latter opportunity presented by St Edward is on a greater scale, contributing much further to the overall targets for homes, specifically affordable in the GWC Opportunity Area.
- **Morrison's Supermarket, 228-246 High Street, Brentford, TW8 0JG** - Planning permission was granted on 4 May 2018 (LPA ref. P/2016/5573) for the demolition of the existing foodstore and redevelopment to provide 3,506 sqm of A1 retail use, 764sqm of A1/A3/A4 floorspace and 221 private rented sector unit.
- The scheme was considered to be of a high-quality design with the development comprising a mix of uses that would be suited to the sustainable location and assisting in the on-going regeneration of the area. The council stated that the proposals would give rise to limited amenity issues, which are balanced against the benefit or much needed housing to include discounted market rents.
- The scheme stated that at least 25% of the units will be at discount market rate. The Homebase scheme proposes 38% LAR affordable housing and so provides a materially larger benefit.

4

PROPOSED DEVELOPMENT



4 PROPOSED DEVELOPMENT

4.1.1. As noted in the introduction, the description of development is as follows:

“Full planning application for the demolition of existing building and car park and erection of buildings to provide residential units, a replacement retail foodstore, with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking, landscaping and associated works”

4.1.2. The key elements of the proposed development comprise:

- Delivery of 473 high quality homes;
- 38% affordable housing (on a habitable room basis);
- A new and modern Tesco retail store of circa 10,550sqm (GIA);
- A new community space of 200sqm;
- 137sqm (GIA) of flexible retail floorspace;
- 400 retail car parking spaces;
- 100 residential car parking spaces;
- Three residential visitor car parking spaces and two car club spaces;
- 204 retail cycle parking spaces;
- 896 residential cycle parking spaces;
- Building heights include a four-storey podium with blocks ranging up to 17 storeys;
- Communal residential amenity space with biodiverse podium gardens including open space and children’s play space;
- New active frontages and improved, safer public realm along Syon Lane and the Great West Road; and
- Dedicated new pedestrian and cycle friendly ‘clean air’ route provided between Syon Lane Station and the Great West Road via Syon Gate Way and new eastern street, Syon Gate Lane.

4.1.3. A summary of the proposed uses and floorspace is set out in the table below:

Table 4-1: Summary of proposed uses and floorspace

Land use	No of units	Gross Floorspace
Residential	473	-
Retail	-	10,550
Flexible	-	137
Flexible commercial, business and service space		200

4.1.4. St Edward Homes Limited is bringing forward the redevelopment of both the Tesco and Homebase sites. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site.

- 4.1.5. The replacement Tesco store would be provided at ground floor level fronting the Great West Road with servicing and back of house uses located to the rear and eastern site boundary. The existing vehicle access on Syon Lane would be retained, with a ramp access route provided to the raised 400-space customer car park, which would be located within a two-storey internal car park podium which would sit above the retail store.
- 4.1.6. The 100 residential car parking spaces, three residential visitor car parking spaces, two car club spaces and cycle parking would be served by the same vehicle access and this would be located within the second-tier podium level and at lower ground floor.
- 4.1.7. Residential accommodation would be provided within five blocks with raised open podium gardens rising from the four-storey podium with blocks ranging up to 17 storeys; with the taller elements located adjacent to the site's eastern boundary. A community space is proposed on the first floor of the Tesco store overlooking the junction corner at Syon Lane and Great West Road. In addition, a small flexible commercial, business and service space is proposed on the Syon Lane frontage.
- 4.1.8. Public realm and landscaping improvements are proposed along Syon Lane and Great West Road including a dedicated new pedestrian and cycle friendly 'clean air' route provided between Syon Lane Station and the Great West Road via Syon Gate Way.
- 4.1.9. The celebration of the site's prominent location on the Great West Road will be promoted through the provision of a new public plaza incorporating an urban glade, planted with mature trees and amphitheatre seating steps orientated towards the main supermarket customer entrance lobby.
- 4.1.10. An indicative image of the proposed development is included at Figure 4-1 below.

Figure 4-1: Proposed Development of the corner of Syon Lan with the Great West Corridor



4.1.11. A summary of what each block comprises is set out below:

- | Building A – Five to 12 storeys stepped building which provides a prominent corner for the Tesco entrance and crossing to the station, whilst also addresses the Gillette Corner by being stepped back.
- | Building B – 17-storey building which creates a gateway into the GWC and addressing the changing grain of the Opportunity Area developments. This limits the interference with the views of Gillette Building along Syon Lane and is set away in views from Syon Park.
- | Building C – 10-storey building marking the arrival at the corner from Syon Lane Station and a communal entrance for all residents.
- | Buildings D and E – Part-seven/part-eight storey and stepped back to address the existing residential context along Syon Lane and arranged perpendicular to the road to maximise daylight into podium gardens, whilst minimising impact to neighbouring residential buildings and the Gillette building.
- | Buildings B2 and B3 – Eight to 15-storey building to create a new street frontage along the eastern edge of the Site and to arrange bulkier aspects away from the sensitive historic context.

Figure 4-2: Proposed Development looking north from Syon Lane



5

PRE-APPLICATION ENGAGEMENT AND CONSULTATION



5 PRE-APPLICATION ENGAGEMENT AND CONSULTATION

- 5.1.1. In this section we set out the pre-application and public engagement process which has been undertaken to date which has help shaped the proposals.
- 5.1.2. The evolution of the proposed development has been informed by engagement with a wide range of stakeholders, including local residents, community groups, local councillors, LB Hounslow, TfL, Historic England, GLA officers and members of Hounslow’s Design Review Panel.
- 5.1.3. The process of pre-application and community engagement has involved:
- ▮ Regular meeting with planning, design, conservation and transport officers at LB Hounslow;
 - ▮ One meeting with the Greater London Authority (GLA Officers) and formal letter received;
 - ▮ Several meetings with both TfL and highways officers at LB Hounslow to agree traffic modelling and proposed highway improvements;
 - ▮ One meeting with Historic England and a formal letter received;
 - ▮ Review session with LB Hounslow’s independent Design Review Panel;
 - ▮ Meetings and presentations to local Residents’ Association meetings;
 - ▮ Door knocking exercise with introductory letters to the sites most immediate residents;
 - ▮ Public exhibitions held in October 2019, February 2020 (drop-in) and July 2020 (virtually);
 - ▮ Consultation cabin in the Tesco car park every Tuesday and Saturday from 12th October 2019 and 28th January 2020;
 - ▮ Meetings with councillors and presentation to councillors on 28th July 2020;
 - ▮ Six topic related Community Liaison Group meetings were held between December 2019 and August 2020;
 - ▮ Local residents ‘walk and talk’ events with the design team;
 - ▮ A dedicated project website, which was set up in October 2019;
 - ▮ The Syon Lane Youth Ambassador Programme; and
 - ▮ Online surveys conducted through the award winning Built-ID digital engagement tool.
- 5.1.4. A summary of the public engagement process is set out below, with full details provided in the Statement of Community Involvement.

COMMUNITY ENGAGEMENT

- 5.1.5. Full details of the consultation process, engagement and how the proposal has evolved as a result of this process is included in the Statement of Community Involvement.
- 5.1.6. The primary purposes of the consultation process were:
- ▮ To increase awareness of the proposed development, ensuring that people understand what is proposed and why; and
 - ▮ To develop stronger proposals that are influenced by the knowledge and views of key stakeholders.

Public exhibitions

- 5.1.7. Almost 200 local residents attended the public exhibition events, engaged with through the consultation website and community events.

- 5.1.8. Public exhibitions were held first held on 3 October and 8 October 2019. A second round of public exhibitions were held on 27 February 2020 and 29 February 2020. Flyers promoting the public event were sent to 6694 residential properties in the surrounding area.
- 5.1.9. The first exhibition gave attendees the first opportunity to learn more about the proposals and the project team.
- 5.1.10. An analysis of the feedback forms showed that most of responses would like to see new public green spaces and improved transport links. The biggest concerns were in regard to the traffic impact and the height and scale of the development. An overwhelming 85% of respondents said that they would like to see improved connections to the station.
- 5.1.11. The aim of the second exhibition was to present the latest proposals and demonstrate how the earlier feedback had helped to inform the proposals as well as providing an opportunity for local residents to meet the project team and provide their latest feedback.
- 5.1.12. An analysis of the feedback forms highlighted that transport and traffic were most important considerations, followed by local infrastructure, green and open spaces, community facilities and pedestrian experience respectively.
- 5.1.13. Whilst 43% of people disagreed that ensuring no net increase in parking was a helpful approach, 50% agreed with the improvements to pedestrian and cycle routes and 57% supporting the improvements to connectivity.
- 5.1.14. A third public exhibition was to be held in late June however in the current circumstances this could not be a face-to-face exhibition.
- 5.1.15. A virtual exhibition was held on 14 August and flyers were distributed within the consultation boundary in the days leading up to the exhibition going live. The exhibition was for information purposes only, allowing people to see the full proposals that have been submitted.

Responding to Covid-19

- 5.1.16. As a result of the coronavirus pandemic and the subsequent restrictions on public gatherings, adapted the planned consultation strategy to respond to social distancing restrictions.
- 5.1.17. Prior to social distancing restrictions which came into place late March 2020, the majority of the public consultation for the project had already been carried out. This included several CLG meetings and two public exhibition events and the consultation cabin in the Tesco car park for four months.

Consultation cabin

- 5.1.18. The project team created a dedicated consultation centre on the Tesco Osterley Site to which over 100 local residents have visited. This was open in the Tesco car park every Tuesday and Saturday from 12th October 2019 and 28th January 2020.
- 5.1.19. The consultation centre has also been home to frequent Community Liaison Group (CLG) meetings, dedicated to discussing key topics in which representatives from local Residents Associations and the community have met with the project team to review and discuss the proposals.
- 5.1.20. Five CLG meetings were held in total, which were attended by 20 people, including the representation of seven resident associations and community groups. The CLG meetings can be summarised as follows:

- i CLG Meeting 1 (6 December 2019) discussed what assets or initiatives were valued within the community and where gaps in community provision could be identified and described. Members felt there were a lack of informal activities and that spaces could be created for children and teenagers to meet and play.
- i CLG Meeting 2 (17 December 2019) discussed the key transport proposals for the development. Members welcomed the proposals to introduce more sustainable modes of transport, although raised concerns that it may be difficult to change some people's behaviours and dependency on cars.
- i CLG Meeting 3 (14 January 2020) discussed the landscaping approach being taken on site. Members commented that play space is vital to the landscape strategy. They also recognised the importance of landscape in responding to climate change and improving the ecological state of the site.
- i CLG Meeting 4 (25 February 2020) provided a preview to the exhibition and presented the updated development proposals. Various comments were received, including highlighting the need for large family homes in the area, delivering infrastructure improvements, and ensuring cycle paths are maintained.
- i CLG Meeting 5 (18 June 2020) was held virtually via Zoom following the social distancing measures that were introduced in March 2020 and discussed the design and landscaping for the site. Members were interested in understanding what impact the development would have on key views in the area and raised concerns about the sensitivity to neighbours.
- i CLG Meeting 6 (13 August 2020) was held virtually via Zoom and discussed the architecture and landscaping, traffic and transport considerations. Members were interesting in finding out the impact of the proposals on the highways network and how discussions with TfL had progressed, as well as engagement with the Met Police and plans to design out crime.

BUILT- ID SURVEYS

- 5.1.21. A social media marketing campaign was conducted twice for two rounds of surveys. This involved an advert inviting comments and feedback which were targeted to the social media pages of people who live, work or frequently travel around the site.
- 5.1.22. The main goal of the online surveys was to reach as many people as possible from the local area who may have been unable or disinclined to partake in the public consultations but still wanted to vocalise their views.
- 5.1.23. There was a total of 19,873 visits to the page and 6,663 pieces of feedback received. The key feedback themes were community integration, green spaces, design thoughts and transport suggestions.
- 5.1.24. Poll One related to the proposed community space and the preferred use of the development's new green and outdoor space. A total of 638 responses were received and the majority (43%) sought a community garden, followed by a picnic area (36%), outdoor gym (14%) and pop-up dog park (7%).
- 5.1.25. Poll Two related to the local environment and the public's top environmental issues. A total of 411 responses were received and the majority (57%) related to air quality, followed by lack of green space (54%), loss of biodiversity (51%).
- 5.1.26. Poll Three related to local transport and what the public would prefer to see in the proposed development. A total of 347 responses were received and the majority (33%) sought cycle paths

and parking. Followed by better pedestrian routes (32%), better road surfaces (25%) and electric car ports (9%).

HOW ENGAGEMENT HAS INFLUENCED THE PROPOSED DEVELOPMENT

- 5.1.27. This consultation process has been the forum through which we have been able to identify key issues for those who visit, live and work in the local community. Many stakeholders and local residents' involvement in developing and shaping the proposals has been valuable and it is recognised the importance of their input and comments. The scheme has responded to the comments received, balancing optimisation of the brownfield development potential of the site with all the other planning and heritage considerations.
- 5.1.28. Key elements of the proposed development that have been influenced by the consultation of the above parties include:
- ▮ Reducing the height of the tallest tower element and buildings facing Syon Lane (Blocks D&E), setting back upper levels and articulation to ensure less sense of street enclosure to minimise daylight and sunlight impact to neighbouring residential buildings and impact of views of the Gillette Building;
 - ▮ Reducing the width of Blocks D and E to increase the distance between facades, adding more shared amenity space at podium level to improve daylight effects and improve visual impact on Syon Lane;
 - ▮ Development of the articulation and materiality of façades on eastern elevation as a result of heritage constraints and important views including from Syon Park;
 - ▮ Setting back of upper levels of corner building A to soften the view looking westwards on the eastern approach to the Site on the A4;
 - ▮ Contextual and placemaking analysis to assist simplifying unifying building typologies;
 - ▮ Consideration for future proofing for parking element of the Tesco store;
 - ▮ Privacy, overlooking and daylight and sunlight studies undertaken to ensure residential amenity protected;
 - ▮ Minimisation of single aspect units and consideration of housing quality;
 - ▮ Podium gardens evolved to include play space and detailed landscape proposals;
 - ▮ Introduced 'clean air routes' that respond to the emerging policy requirement and link to wider desire lines;
 - ▮ Clearer public realm narrative developed to establish concept;
 - ▮ Access strategy has evolved from more analysis of pedestrian movements; and
 - ▮ Highway feasibility review and undertaking modelling to ensure highways, pedestrian and cycle safety.

6

PLANNING POLICY AND GUIDANCE



6 PLANNING POLICY AND GUIDANCE

6.1.1. In this section, we identify the planning policies that are most relevant to the determination of this application and that form the basis for the assessment in Sections 7 to 20.

6.1.2. Relevant planning policies are included in **Appendix 2** for reference.

THE DEVELOPMENT PLAN

6.1.3. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.

6.1.4. The Development Plan for the purpose of the determination of this planning application comprises:

- ┆ Adopted London Plan (2016);
- ┆ Draft London Plan [Adoption expected Summer 2020];
- ┆ Hounslow Local Plan 2015 to 2030 volume one; and
- ┆ Hounslow Local Plan 2015-2030 volume two.

6.1.5. A summary of key policies from these documents are identified below. Please refer to **Appendix 2** for full wording of relevant policies.

Adopted London Plan (2016)

- ┆ Policies 2.13 and 2.18 set out the strategy in Inner London for opportunity areas and green infrastructure;
- ┆ Policies 3.3 – 3.8 seek to guide London's housing supply;
- ┆ Policies 3.10, 3.11 and 3.13 set out the approach to affordable housing;
- ┆ Policy 4.7 sets out the strategy for retail and town centre development;
- ┆ Policies 5.2 and 5.3 relate to climate change mitigation;
- ┆ Policies 5.11 and 5.13 provide steer for climate change adaptation;
- ┆ Policies 6.1, 6.9, 6.10 and 6.13 set out the approach to connecting London through integrating transport and development;
- ┆ Policy 7.7 provides steer on the location and design of tall and large buildings;
- ┆ Policies 7.8 and 7.9 guide developments that relates to the historic environment and landscapes;
- ┆ Policies 7.14 and 7.15 set out the approach to air and noise pollution; and
- ┆ Policy 7.19 sets out the strategy for protecting biodiversity and access to nature.

Adopted Hounslow Local Plan (2015)

- ┆ Policy SV1 sets out the spatial vision for the GWC;
- ┆ Policies SC1 – SC5 sets out the approach for sustainable mixed communities, including delivering housing;
- ┆ Policies CC1 – CC4 provide steer on valuing the context and character of development sites, including heritage assets;
- ┆ Policies TC1 and TC3 guide the approach to developing town centre networks and uses;
- ┆ Policies EC1 and EC2 seeks to enhance transport connectivity throughout Hounslow;

- Policies GB2, GB4, GB7 and GB9 set out Hounslow’s approach to enhancing green and blue infrastructure throughout the borough;
- Policies EC1 – EQ5 seek to protect and enhance the environmental quality of development; and
- Policy ED2 relates to maintaining the borough’s employment land supply.

EMERGING DEVELOPMENT PLAN DOCUMENTS

Emerging Hounslow Local Plan Review

- 6.1.6. LB Hounslow is currently in the process of preparing its GWC Local Plan Review and Site Allocations Document, setting out a vision for the borough for the next 15 years. The Plan has undergone extensive consultation but not yet been scrutinised at Examination. Due weight can be given to individual emerging policies with consideration of the extent to which there are unresolved objections to the relevant policies. Relevant policies include:
- Policies GWC1 – GWC 6 sets out the spatial policies, including employment growth, housing, heritage, environmental quality and open space, and transport;
 - Policies P1 and P2 provide spatial guidance that focuses on the growth and regeneration of the west, central and east areas of the GWC; and
 - The Local Plan Review Site Allocations document sets out at Site allocation 11 that the Homebase Syon Lane will be redeveloped to provide a mixed-use development.
- 6.1.7. The Great West Corridor Masterplan is an evidence base document which is being used to inform the emerging Great West Corridor Local Plan review however this does not form part of the emerging Local Plan Review policy document in terms of formal adoption.

Intend to Publish London Plan (2019)

- 6.1.8. The Examination in Public on the Draft London Plan was held between January and May 2019. Following the Inspectors’ report and recommendations in October 2019, the Mayor of London published the Intend to Publish London Plan in December 2019. The Secretary of State wrote to the Mayor to request that changes were made to certain policies in the Intend to Publish London Plan in March 2020. At present, the Intend to Publish London Plan is being considered by the Secretary of State, with a view of adoption in Summer 2020.
- 6.1.9. Those policies in the Intend to Publish London Plan that are not the subject of the Secretary of State’s intervention can be given significant weight due to the stage of preparation and the lack of unresolved objections. Unless specifically identified in the relevant section, the policies referenced in this statement are not affected by the Secretary of State’s comments and therefore can be given significant weight. The relevant policies that apply to the development include:
- Policies GG2, GG4 and GG6 set out London’s “Good Growth” strategy – that which is socially and economically inclusive and environmentally sustainable;
 - Policies H1, H4, H5, H6 and H10 sets out London’s strategy for housing, including affordable homes;
 - Policies D2, D3, D4, D6, D7, D9, D13 and D14 provide guidance on the approach to delivering good design, including infrastructure, housing quality and standards, and accessibility;
 - Policy HC1 relates to heritage conservation and growth;
 - Policies SD1 and SD7 set out London’s approach to spatial development patterns, including town centre redevelopments;

- ┆ Policies E7 and E9 form part of London's economic strategy, relating to industrial and retail markets;
- ┆ Policies T1 – T6 sets out the strategy for transport;
- ┆ Policy S4 guides play and informal recreation;
- ┆ Policies G4 – G7 provides the approach toward green infrastructure and the natural environment; and
- ┆ Policies S11 – S15, and S13 sets out the strategy for sustainable infrastructure.

OTHER MATERIAL PLANNING CONSIDERATIONS

National Planning Policy Framework (2019)

- 6.1.10. The revised National Planning Policy Framework (NPPF) was published on 24 July 2018 and was updated in February 2019 and 19 June 2019. This sets out the Government's planning policies for England and how these are expected to be applied. The National Planning Practice Guidance (NPPG) which is regularly updated sits alongside the NPPF and provides guidance on how the policies should be applied.
- 6.1.11. Both the NPPF and NPPG are important material considerations in the determination of planning applications. Central to the NPPF is the presumption in favour of sustainable development in paragraph 11. It advises that, for decision-taking, this means approving development proposals that accord with the development plan without delay.
- 6.1.12. With reference to the proposed development, key chapters from the NPPF include:
- ┆ Chapter 2 – achieving sustainable development;
 - ┆ Chapter 5 – delivering a sufficient supply of homes;
 - ┆ Chapter 6 – building a strong, competitive economy;
 - ┆ Chapter 8 – promoting healthy and safe communities;
 - ┆ Chapter 9 – promoting sustainable transport;
 - ┆ Chapter 11 – making effective use of land;
 - ┆ Chapter 12 – achieving well-designed places; and
 - ┆ Chapter 16 – conserving and enhancing the historic environment.
- 6.1.13. The National Design Guide (2019) also provides guidance outlines and illustrates the government's priorities for well-designed places by focussing on good design, helping to inform development proposals and their assessment by local planning authorities.

HOUNSLOW SPDs AND SPGs

Planning Obligations and CIL SPD (2015)

- 6.1.14. This supplementary planning document (SPD) gives guidance on how planning obligations or Section 106 (S106) agreements and the Community Infrastructure Levy (CIL) are calculated and how they work alongside each other.

Air Quality SPG (2008)

- 6.1.15. The Air Quality SPG provides technical advice for how air quality can affect proposed development.

Evidence Base Documents

- 6.1.16. The Hounslow Urban Context and Character Study (2014) sets out to understand how the uniqueness and personality of Hounslow's areas can be maintained through innovation and planning.
- 6.1.17. There are a number of supporting studies which have been prepared to support the emerging Local Plan Review Documents and they include the Hounslow Strategic Flood Risk Assessment 2019, GWC Masterplan and Capacity Study 2019, Retail and Town Centre Needs Study 2018, Hounslow Local Plan Reviews Viability Assessment 2019, Hounslow Strategic Market Assessment 2018, GWC Transport Impact Assessment 2019, Hounslow Infrastructure Delivery Plan 2019 which are relevant to this application.

GLA GUIDANCE

- 6.1.18. The GLA has published a number of guidance documents which should be read alongside the London Plan and they include the following:

Energy Planning Guidance (Updated April 2020)

- 6.1.19. This Mayoral SPD relates to the Mayor's ambition for London to be net zero-carbon, meaning that all new major developments must play a part in meeting the net zero requirements in the London Plan.

Affordable Housing and Viability SPG (2017)

- 6.1.20. This Mayoral SPD relates to the Mayor's commitment to increasing the level of affordable housing delivered through the planning process.

Housing SPG (2016)

The Housing SPG, published by the GLA in 2016 provides guidance on the implementation of housing policies. The guidance provides details on the following relevant matters:

- Housing supply;
- Housing quality;
- Housing choice; and
- Social infrastructure.

Play and Informal Space SPD (2012)

- 6.1.21. This Mayoral SPD relates to shaping neighbourhoods and provides detailed guidance to meet the varying play and informal space needs for children and young people.
- 6.1.22. A number of other pre-consultation draft SPD's are published relating to Good Quality Homes for all Londoners (March 2020), Circular Economy (April 2020), Fire Safety (July 2020)

OTHER RELEVANT GUIDANCE

West London Cycle Parking Guidance (2017)

- 6.1.23. This document sets out guidance on cycle parking solutions for developers and planners for developments in West London, condensing areas of both the London Plan and the London Cycle Design Standards.

7

PRINCIPLE OF DEVELOPMENT



7 PRINCIPLE OF DEVELOPMENT

- 7.1.1. This section sets out the key principles of development, including housing need, suitability of the site for residential led mixed-use development, as well as the site's status within the GWC Opportunity Area which demonstrate that the principle of development should be supported.

POLICY CONTEXT

- 7.1.2. There is a pressing need for new homes within the Borough. Rising housing targets nationally and in London has put increasing pressure on local authorities to deliver new housing.
- 7.1.3. The NPPF is clear in its instruction for the need for a boost in the supply of housing, and that it is important that a sufficient amount and variety of land can come forward where needed (paragraph 59).
- 7.1.4. The adopted London Plan sets out the annual average housing supply monitoring targets between 2015 – 2025. Policy 3.3 of the adopted London Plan highlights the Mayor's pressing need for more homes in London, seeking an annual average of 42,000 net additional homes across London. This states that Hounslow's minimum ten-year target is 8,222, equivalent to 822 per year. The proposed development will make a significant contribution towards meeting the currently adopted housing targets for London and will provide an enhanced environment on site as well as in the wider area, improving housing choice, affordability and high-quality accommodation in line with Policy 3.13 of the adopted London Plan.
- 7.1.5. The Intend to Publish London Plan has increased the borough's ten-year housing target to 17,820 net housing completions; equivalent to 1,782 per annum. This represents an increase of 117% against the adopted London Plan targets (2016). As noted in Chapter 6, the Intend to Publish London Plan is close to adoption and it is likely that the Borough will be held accountable to this figure imminently.

HOUSING NEED AND HOUSING SUPPLY

- 7.1.6. Although LB Hounslow have been able to demonstrate a five-year housing supply against the housing target of 882 homes per year as set out in the adopted London Plan, this target will more than double to 1,782 homes per year in the Intend to Publish London Plan. Having gone through Examination in Public and following the Inspector's Report, the weight to be given to the target in the emerging London Plan is significant.
- 7.1.7. The recent rates of delivery (averaging 1,200 homes per year in the five years to 2017/18), are set out in the most recently and publicly available Annual Monitoring Report 2017/18. This will need to significantly increase in order to meet the target in the emerging London Plan. With the doubling of housing targets, the rate of delivery in LB Hounslow will also need to double, which will require a step change in the Council's approach to ensuring that sites such as this are optimised to deliver an appropriate quantum of housing.
- 7.1.8. It should be noted that the 5, 10, and 15-year housing supply included in the latest AMR takes account of site allocations and therefore the site and the Homebase Brentford site already form a vital element of this supply.

- 7.1.9. Once the new target is adopted, the Housing Delivery Test, as described in the PPG, will then be tested against this figure. Failure against the required percentages can result in the presumption of sustainable development being applied (if delivery is below 75%), which would restrict the Council's control over development coming forward in the Borough. Therefore, the Council must ensure that the delivery of homes is stepped up adequately to avoid penalties. Currently, the Council scores 104% and therefore is slightly over compliance. The increase in the housing requirement will risk the Council's performance.
- 7.1.10. Accordingly, there is a need for the Council to bring forward key sites that can contribute to housing delivery in the Borough and ensure the Borough maintains its performance in delivering new homes for its residents. Policy SC1 of the adopted Local Plan sets out that the Council is committed to exceeding its London Plan target and encourages development proposals that are on previously developed land, are of high-quality design and provide necessary infrastructure.
- 7.1.11. In this context, the proposed development at the Homebase site for 473 new homes forms part of the wider strategic opportunity for St Edward to deliver up to 2,150 new homes and the delivery of around 725 new affordable homes, will help to address local and strategic delivery shortfalls, representing a benefit that should be given significant weight in the planning balance.

GWC OPPORTUNITY AREA

- 7.1.12. The site is within the Great West Corridor Opportunity Area, an area of growth identified as having the ability to make a significant contribution to the delivery of new homes and jobs within the capital.
- 7.1.13. Within Policy SV1 of the adopted Hounslow Local Plan, the Great West Corridor is identified as a potential 'Opportunity Area' (OA) or an 'Intensification Area' which can support meeting London-wide needs for housing and employment on underutilised land, linked to existing and potential transport accessibility.
- 7.1.14. Policy 2.13 of the adopted London Plan states that development proposals within opportunity areas seek to optimise residential and non-residential outputs and densities, provide social and other infrastructure to sustain growth. The policy seeks to support wider regeneration and integrate development proposals to the surrounding areas especially areas for regeneration.
- 7.1.15. The Great West Local Plan Review commits the Borough to delivering these new homes and jobs within the Opportunity Area. It takes the Intend to Publish London Plan targets further, with a baseline of 7,500 new homes and a high of 9,000; targeting 3,000 affordable homes; and 17,600 new jobs.
- 7.1.16. As part of the Vision Delivery and strategic objectives of the emerging GWC Local Plan Review, the Council will seek to deliver 7,500 new homes and to provide high-quality new homes in sustainable locations where they integrate with businesses shops and community uses to deliver liveable places. The Local Plan Review sets out other objectives of the GWC including:
- i 3,000 affordable homes;
 - i One new leisure centre;
 - i Two new stations;
 - i Two expanded health hubs;
 - i 17,600 new jobs;
 - i Two Creative Enterprise Zone;
 - i Two new secondary free schools; and

- ┆ Three secondary school expansions.
- 7.1.17. As set out in the Strategic Opportunity section (Section 2), the opportunity of relocating the Tesco store to the Homebase site is acknowledged in the Council's emerging Local Plan evidence base. The GWC Masterplan Capacity Study March 2019 identifies the move as an alternative option for redevelopment, which would deliver benefits through comprehensive change, making more efficient use of land and delivering housing in accordance with the Mayor's objectives for the Opportunity Area.
- 7.1.18. Section 6.1: Golden Mile Quarter of the Council's Masterplan Capacity Study establishes key principles for future re-development of the sites including the following:
- ┆ To allow for the co-location of the Tesco Extra supermarket and residential uses on the Site (alternative scenario);
 - ┆ To create vibrancy and buzz through a mix of uses and active frontages;
 - ┆ To enhance and establish a sense of place through strengthening special characters, heritage assets and landscape features;
 - ┆ To create a visible commercial frontage against the Great West Road and buffer between non-employment uses;
 - ┆ To reduce reliance on the private car and improve public transport accessibility, enhancing the interchange between modes and providing good walking and cycling environments to create clean air routes; and
 - ┆ To transform the quality of the Great West Road through landscaped green corridors with quality public realm.
- 7.1.19. In response to these principles, and as set out in the Design and Access Statement, significant design work has been undertaken to best highlight these placemaking objectives with key technical design parameters including store configuration, layout, parking and access making the best use of this brownfield site location in the emerging Opportunity Area accordance with Paragraph 59 of the NPPF, The Intend to Publish London Plan Policies GG2, GG4, SD1 and Local Plan Policies SV1, SC1 having regard to all the other planning considerations including respecting the setting and special character of nearby heritage assets.
- 7.1.20. The proposed development responds directly to the vision set out in the Great West Corridor Local Plan Review, such as through (full breakdown included in the Design and Access Statement):
- ┆ Unlocking the regeneration of the adjacent Tesco site to deliver comprehensive mixed-use schemes with substantial housing on the two sites;
 - ┆ Vibrancy and buzz created through a new active Tesco store and community space at Gillette corner, a flexible use on Syon Lane and a new residential hub linking to Syon Lane Station;
 - ┆ Enhancement of a sense of place through new, safe public realm, and through strengthening special characters and heritage, incorporating art deco style landmark building and attractive landscape features;
 - ┆ Creation of a visible Tesco frontage against the Great West Road and buffer between non-employment uses;
 - ┆ Provision of a community use which will be a non-profit facility available to the community;
 - ┆ Reducing reliance on the private car by reducing amount of retail parking spaces, improving public transport accessibility through new bus stops and routes, enhancing the link to the station, providing new clean air routes with new cycle and pedestrian routes; and

- i Transforming the quality of the Great West Road through landscaped green corridors with quality public realm and attractive podium gardens to enhance biodiversity.

Site Allocation

- 7.1.21. The emerging Great West Corridor Local Plan Review and Site Allocations document identify both the Tesco and Homebase Brentford sites as individual site allocations with the potential to provide residential development.
- 7.1.22. The emerging Local Plan Review Site Allocations document proposes that the Homebase Syon Lane should be developed to provide a mixed-use development which links Gillette Corner with Syon Lane Station (Site Allocation 11).
- 7.1.23. The Site Allocations document goes on to say that the land uses (based on the old Use Classes Order) should be business (Class B1a/b), residential (Class C3) and “large format retail” (Class A1). Specifically, the draft document states that the Homebase site has been allocated a minimum development quantum of 340 residential units. The full minimum development quantum is set out below:

Table 7-1: Maximum development quantum

Minimum Development Quantum	
Residential units (Class C3)	340
Business (Class B1a, B1b) (sqm)	6,910
Parking (sqm)	4,880
Retail (Class A1-A4) (sqm)	2,750

- 7.1.24. Overall, St Edward are supportive of the Council’s proposed allocation and their intention to earmark the site for new homes, business and retail use. However, we have raised concerns throughout the statutory consultation process regarding some of the detail on what can be achieved on the site.
- 7.1.25. The principle of development on this site, the opportunity to deliver a residential-led scheme and a focal area with a mix of uses that will act as a meeting place new and existing residents and workers should be supported.

SUITABILITY OF THE SITE FOR RESIDENTIAL-LED MIXED USE DEVELOPMENT

- 7.1.26. Taking into account the above, the site is optimally located within an Opportunity Area, in a Borough of rising housing need, providing the conditions for innovative strategies to capture growth. On top of this, the site is previously developed land, well located adjacent to Syon Lane Station, existing bus routes, local open spaces and the employment areas and amenities of the Great West Road, and significantly underutilised compared to its context within the GWC.
- 7.1.27. These characteristics have been identified in the Council’s emerging Local Plan Review through its site allocation. Therefore, the site already forms part of the sites considered deliverable as part of the Council’s five-year housing land supply. Under its draft site allocation (Site Allocation 11, Draft Hounslow Site Allocations), the Council supports the intensification of use on the site and ‘large

format' retail alongside the introduction of residential development on the site. Specifically, the draft document states that the Homebase site has been allocated a minimum development quantum of 340 residential units.

- 7.1.28. Discussions with officers at pre-application have established that there is agreement that the minimum figure of 340 new homes significantly underrepresents the potential of the site to deliver new homes.
- 7.1.29. The reuse of previously developed land is supported by paragraph 117 and 118 of the NPPF which promote the effective use of land, in particular making as much as possible use of brownfield sites.
- 7.1.30. Policy 3.7 of the adopted London Plan states that proposals for large residential developments including complimentary non-residential uses are encouraged in areas of high public transport accessibility. Whilst, the Intend to Publish London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their planning decisions, especially sites which are located within 800m distance of a train station.
- 7.1.31. Adopted Policy SC1 supports this objective by encouraging effective use of land and reusing previously developed land provided that it is not of high environmental value or in a use that is protected otherwise in the Local Plan.
- 7.1.32. These characteristics have been identified in the Council's emerging Site Allocations Document where they support the intensification of the use of the site and introduction of residential development. It should therefore be considered that the site is previously developed land, in a highly sustainable location which is available for redevelopment and so the principle of a mixed-use development should be supported.

8

AFFORDABLE HOUSING



8 AFFORDABLE HOUSING

AFFORDABLE HOUSING

- 8.1.1. This section sets out the policy context surrounding affordable housing and sets out the proposed affordable housing mix and how this is split between tenures.

POLICY CONTEXT

The Fast Track Approach

- 8.1.2. The Mayor of London first introduced the fast track approach to affordable housing in the Affordable Housing and Viability Supplementary Planning Guidance, which was adopted in August 2017 and is an important material consideration on relevant applications. The aims of this approach were:
- To introduce a transparent and easily understood target;
 - To avoid protracted discussions on viability and associated delays to the determination of the applications; and
 - To speed up the delivery of affordable homes.
- 8.1.3. Under the SPG, applications providing a minimum of 35% affordable housing (on most sites) will follow the fast track route, which means they will not be tested for viability and will not be subject to any late stage review of viability. The affordable tenure split requirements are 30% affordable/social rent, 30% intermediate and the remaining 40% to be determined by the borough.

London Plan Policy

- 8.1.4. The affordable housing policies in the old adopted London Plan predate the fast track approach. Policy 3.11 of the adopted London Plan (2011) sought the maximum reasonable amount of affordable housing, with a target mix of 60% affordable/social rented and 40% intermediate tenures.
- 8.1.5. The fast track approach has been introduced into the policies in the new London Plan and it is these policies that are in practice being used in the determination of strategic planning applications. As with the Mayor's SPG, under Policy H5 of the Intend to Publish London Plan (2019) applications are able to follow the fast track route if they provide a minimum of 35% affordable housing and meet the tenure split within Policy H6 of 30% affordable/social rent, 30% intermediate and the remaining 40% to be determined by the borough. Policy H4 of the Intend to Publish London Plan sets a strategic target of 50% affordable housing. This is a strategic target which is not applied to all individual applications for major residential developments.
- 8.1.6. The Intend to Publish London Plan is at a very advanced stage. It has been subject to examination and updated following the Inspectors' report. The outstanding matters subject to discussion with the Secretary of State are unrelated to affordable housing policies. In accordance with paragraph 48 of the NPPF, given its advanced stage of preparation and the lack of unresolved objections to the affordable housing policies in the Intend to Publish London Plan, these policies have very significant weight. In practice, it is therefore Policy H5 and H6 of the Intend to Publish London Plan that are taking primacy over the older affordable housing policies in the adopted London Plan in the determination of strategic planning applications.

LB Hounslow Policy

- 8.1.7. As with the policies in the old adopted London Plan, the affordable housing policies in the adopted Hounslow Local Plan (2015) predate the fast track approach. Policy SC2 in the Hounslow Local Plan is aligned with the old London Plan, seeking the maximum reasonable amount of affordable housing to be negotiated on a site by site basis with reference to the strategic borough-wide target of 40%, and seeking a mix of 60% affordable/social rented and 40% intermediate tenures. Policy SC2 in the adopted Hounslow Local Plan (2015) is not in conformity with the fast track approach in the Intend to Publish London Plan.
- 8.1.8. Appendix 1 to LB Hounslow's Local Development Scheme sets out a matrix of which policies from the 2015 Local Plan will continue to apply in each area, and which will be superseded. This confirms that Policy SC2 is to be superseded by new Draft London Plan Policy and West of Borough and Great West Corridor housing policies. As discussed above, the affordable housing policies in the Intend to Publish London Plan hold very significant weight and are already used as primary policies in the determination of strategic planning applications. It is therefore appropriate for the affordable housing policies in the Intend to Publish London Plan to take primacy over Policy SC2 in the Hounslow Local Plan in the same way as they are over Policy 3.11 of the adopted London Plan.

LB Hounslow Introducing the Fast Track Approach

- 8.1.9. LB Hounslow has formally supported the adoption of the fast track approach in its representations on the new London Plan and is in the process of introducing it into local policy. LB Hounslow is currently working on the emerging Great West Corridor Local Plan Review, which will sit alongside the adopted Hounslow Local Plan and update it so that it is in conformity with the new London Plan.
- 8.1.10. Draft Policy GWC2 of the Great West Corridor Local Plan sets a strategic target of 50% but also states that LB Hounslow will apply a fast track approach in line with the new draft London Plan. This means that on a site basis, applications proposing 35% affordable housing will not be tested for viability and will not be subject to any late stage review of viability. It refers to a tenure split of 70% London Affordable Rent or social rent and 30% intermediate.
- 8.1.11. Whilst Draft Policy GWC2 of the Great West Corridor Local Plan will also supersede Policy SC2, this is not at as advanced a stage of preparation as the Intend to Publish London Plan and has not undergone examination and cannot be given the same degree of weight at this stage. It is therefore appropriate for the Council to give greater weight to the fast track threshold and the tenure split requirements in the Intend to Publish London Plan, rather than those in the older Hounslow Local Plan or the emerging Great West Corridor Local Plan Review.
- 8.1.12. In practice, this means that it is appropriate to apply the fast track approach to planning applications in LB Hounslow and that the threshold tests for a fast track application are:
- 35% affordable housing by habitable room; and
 - An affordable housing tenure split of 30% affordable/social rent, 30% intermediate and the remaining 40% to be determined by the borough.
- 8.1.13. On the basis of discussions with LB Hounslow, we understand that, in this case, the remaining 40% to be determined by the borough has been agreed as a further 20% London Affordable Rent and a further 20% as intermediate. This results in an overall tenure split requirement of 50% London Affordable Rent and 50% intermediate.

Affordable Housing Commitment and Interdependent Applications

- 8.1.14. St Edward Homes Limited is bringing forward the redevelopment of both the Tesco Osterley and Homebase Brentford sites. These are the subject of separate planning applications, but it is a factual reality that the schemes are interdependent and would be formally linked through their s106 agreements. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site. There would not be two Tesco stores open for trading at the same time on these sites, and planning obligations are proposed to control this scenario and prevent this from taking place (see Planning Obligations submitted).
- 8.1.15. As these interdependent planning applications would be formally linked through their respective s106 agreements, it is appropriate to consider the cumulative affordable housing offer across both developments.
- 8.1.16. **The cumulative affordable** housing offer comprises:
- 36% affordable housing by habitable room
 - An affordable tenure split of 50% London Affordable Rent and 50% intermediate by habitable room
- 8.1.17. **The Homebase Brentford** application proposes:
- 164 affordable homes comprising 62 x 1-bed, 57 x 2-bed, 40 x 3-bed and 5 x 4-bed, which equates to 38% affordable housing by habitable room and 35% by unit; and
 - All 164 affordable homes would be delivered as London Affordable Rent and delivered early in the context of the overall schemes, prioritising the council's needs for social rented accommodation – a substantial benefit of the scheme of the scheme which has implications for diminished positive cashflow to St Edward.
- 8.1.18. **The Tesco Osterley** proposes to provide the balance of affordable housing to ensure that the cumulative proportion of affordable housing across both developments is no less than 35% by habitable room, and the cumulative affordable tenure split contains no less than 50% London Affordable Rent (by habitable room). As this is an outline application with all matters reserved except access, the specific number of homes would be established through the reserved matters process.
- 8.1.19. Based on the illustrative masterplan scheme, this equates to an affordable provision of:
- 561 affordable homes comprising 194 x 1-bed, 311 x 2-bed and 56 x 3-bed, which equates to 35% affordable housing by habitable room and 35% by unit; and
 - An affordable tenure split of 66% intermediate and 34% London Affordable Rent (by habitable room).
- 8.1.20. This is summarised in the table below.

Table 8-1 – Affordable Housing Offer

	Hab rooms	
Homebase		
London Affordable Rent	476	100% of Homebase affordable
Shared ownership	0	0% of Homebase affordable
Affordable total	476	38% of Homebase hab rooms
Private	776	62% of Homebase hab rooms
Total	1,252	
Tesco*		
London Affordable Rent	524	34% of Tesco affordable
Shared ownership	999	66% of Tesco affordable
Affordable total	1,523	35% of Tesco hab rooms
Private	2,814	65% of Tesco hab rooms
Total	4,349	
Cumulative		
London Affordable Rent	1,000	50% of total affordable
Shared ownership	999	50% of total affordable
Affordable total	1,999	36% of total hab rooms
Private	3,602	64% of total hab rooms
Total	5,601	

Meeting the Fast Track Threshold

- 8.1.21. The cumulative provision of 36% affordable housing with an affordable tenure split of 50% London Affordable Rent and 50% intermediate meets the threshold for the fast track approach in the relevant policies, being Policy H5 and Policy H6 of the Intend to Publish London Plan and the Mayor's SPG.
- 8.1.22. The Tesco Osterley application in isolation would provide a tenure split that is not in line with the above agreement as a result of the substantial planning benefit of delivering the social rent dimension early and in excess of policy requirements on Homebase. This can be treated as fast track for the purposes of Policy H5 and the Mayor's SPG for the following reasons:

- The two developments are interdependent, and the applications would be formally linked through their s106 agreements;
- The Tesco Osterley development could not be delivered in isolation and requires the delivery of the Homebase Brentford development first; and
- There is clear public benefit to delivering a higher proportion of affordable housing, and higher proportion of London Affordable Rent, on the Homebase Brentford as it would be delivered first.

8.1.23. In accordance with Policy H5 of the London Plan and the Mayor's SPG, and with reference to the significant weight to be attached to the policies in the Intend to Publish London Plan, both applications can be treated as fast track. The GLA supports this approach has confirmed in its pre-application advice that both applications should be treated as fast track.

8.1.24. This means that the two applications should not be tested for viability. Under the requirements of the Intend to Publish London Plan and the Mayor's SPG, they will be subject to an early stage review of viability, in which viability is tested if the development has not been substantially implemented by an agreed date but will not be subject to any late stage review of viability.

Conclusions

8.1.25. The Mayor of London introduced the fast track threshold of 35% affordable housing in order to avoid protracted discussions on viability and speed up the delivery of affordable homes. The fast track approach is supported by LB Hounslow.

8.1.26. Policy 3.11 of the adopted London Plan predates the fast track approach. The fast track approach has been introduced into the affordable housing policies in the Intend to Publish London Plan. These policies have very significant weight and are taking primacy over the older affordable housing policies in the adopted London Plan in the determination of strategic planning applications.

8.1.27. Policy SC2 of the Hounslow Local Plan predates the fast track approach. It is not in conformity with the new London Plan and the Local Development Scheme confirms that policies in the new London Plan will supersede it. With the weight now attributable to the policies in the Intend to Publish London Plan, it is appropriate for LB Hounslow to apply the fast track approach as set out in the Intend to Publish London Plan and the Mayor's SPG.

8.1.28. The cumulative provision of 36% affordable housing with an affordable tenure split of 50% London Affordable Rent and 50% intermediate meets the threshold for the fast track approach in the relevant policies, being Policy H5 and Policy H6 of the Intend to Publish London Plan and the Mayor's SPG.

8.1.29. It is appropriate to take a cumulative approach to the assessment of affordable housing across the two sites because two developments are interdependent, and the applications would be formally linked through their s106 agreements. The GLA supports this approach and agrees that both applications should be treated as fast track.

9

HOUSING MIX



9 HOUSING MIX

9.1.1. This section sets out the policy context relating to housing mix, it then sets out the proposed mix and justification for the composition proposed.

POLICY CONTEXT

- 9.1.2. Policy 3.4 of the adopted London Plan states that optimising housing potential should take into account local context and character as well public transport capacity. Development should optimise housing output for different types of location within the relevant density range.
- 9.1.3. Draft Policy H10 of the Intend to Publish London Plan states that schemes should consist of a range of unit sizes. The factors it identifies that should be considered include local evidence of housing need and demand, the nature and location of the site, the aim to optimise housing potential, and the role of one and two bed units in freeing up family housing. Draft Policy H12 of advises that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes.
- 9.1.4. Policy SC2 of the adopted Local Plan seeks new developments to provide housing mix that meets evidenced local need and sets guideline proportions of one-bed, two-bed, three-bed and four-bed units in Table SC 3.1. Draft Policy GWC2 in the Great West Corridor Local Plan Review sets out the most up-to-date housing mix requirements in the local area based on the Strategic Housing Market Assessment 2018. It should be noted that the housing mix within the Strategic Housing Market Assessment reflects strategic targets across the whole borough and across all types of accommodation. These targets should be treated as strategic targets and not applied rigidly on individual sites.

PROPOSED HOUSING MIX

- 9.1.5. Adopted Policy SC3 states that the housing mix targets will be “superseded by new evidence published by the Council”. Policy SC3’s housing mix table is based on the Borough Housing Market Assessment (2009).
- 9.1.6. Emerging Policy GWC2 sets out the most up-to-date housing mix requirements in the local area based on the Strategic Housing Market Assessment 2018. The table below sets out the proposed mix ranges for affordable dwellings against the target (based on unit numbers):

Table 9-3: Proposed mix (affordable housing) against policy SHMA

Tenure	Emerging	Proposed	%									
	1 bed	1 bed		2 bed	2 bed		3 bed	3 bed		4 bed	4 bed	
London Affordable Rent	20%	38%	18%	38%	35%	-3%	29%	24%	-5%	13%	3%	-10%

JUSTIFICATION

- 9.1.7. It should be noted that the housing mix within the Strategic Housing Market Assessment reflects strategic targets across the whole borough. These targets should be treated as strategic targets and not applied rigidly on individual sites, with the proportion of family accommodation in a flatted development expected to be lower by its nature.
- 9.1.8. The housing mix within the market homes has been informed both by the Strategic Housing Market Assessment (2018) and St Edward's assessment of demand for this type of accommodation in this location. Aligning the market mix with demand will help to create a more viable scheme capable of delivering the required proportion of affordable homes. This process has led to a market mix of predominantly one-bed and two-bed homes. This is considered appropriate for a high-density flatted development of this nature near the Town Centre, with recognition of the role that these one-bed and two-bed homes can play in freeing up family housing in the local housing stock.
- 9.1.9. The housing mix within the affordable rent tenure is nearly in line with the target identified in the Strategy Housing Market Assessment and GWC2. This provides those with the greatest needs with homes that closely match the identified need within the Borough.

FAMILY HOUSING

- 9.1.10. The scheme delivers an appropriate amount of three- and four-bedroom units when taking into account the nature of the development. It also delivers on having a higher proportion of three- and four-bedroom units for affordable rent units (27%) to respond to need in this sector particularly.
- 9.1.11. It is also important to note that family housing is defined in the notes section to Policy SC3 which is defined as including all two-bedroom four-person dwellings and larger. This definition was taken into account when calculating the number of family-sized dwellings in the Capital Interchange Way permission (LPA ref. P/2018/4117). With this in mind, the proposed development provides half of the market dwellings at 50% as family housing and 48% as affordable rent.

Table 9-4: Family housing

Tenure	Total as Family Housing
Market	50%
Affordable Rent	48%

- 9.1.12. The housing mix proposed seeks to optimise the development potential of the site; maximise housing delivery; and respond to prevailing local market conditions. The overall proportion is appropriate for a scheme of this nature. It is important to note there is a large proportion of 3 bed affordable rent.

10

DESIGN, SCALE AND MASSING



10 DESIGN, SCALE AND MASSING

- 10.1.1. This section sets out the policy context, design rationale and principles of high-quality design that have been intrinsic to the evolution of the proposed development. It then goes on to justify the density and massing of the schemes, as well as the design and architecture proposed.
- 10.1.2. The Design and Access Statement (DAS), Heritage Statement, and the Townscape and Visual Effect Study (Chapter 8 of the Environmental Statement) which are submitted alongside this Planning Statement provide further explanation and justification for the nature of the scheme.

POLICY CONTEXT

- 10.1.3. NPPF Paragraph 124 is clear in its direction that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development and creating better places in which to live and work.
- 10.1.4. Adopted London Plan Policy 3.5 states that housing developments should be of the highest quality internally, externally and in relation to their context and the wider environment. The design of new housing developments should enhance the quality of local places.
- 10.1.5. Intend to Publish London Plan Policy D5 states that development proposals should achieve the highest standards of accessible and inclusive design. Draft London Plan Policy D9 states that boroughs should determine if there are locations where tall buildings may be an appropriate form of development and that a number of impacts should be addressed in terms of visual, function, environmental and cumulative impact.
- 10.1.6. Adopted Local Plan Policy SC5 will ensure that new housing development contributes to improving the quality and design of housing in the borough. Policy CC1 of the Hounslow Local Plan requires that development proposals have regard to the Urban Context and Character Study (2014) and respond to individual site character and context, improving poor aspects of character whilst conserving existing features and qualities.
- 10.1.7. Adopted Local Plan Policy CC2 states that the Council's approach is to retain, promote and support high-quality urban design and architecture to create attractive, distinctive, and liveable places. The Council expects development proposals to respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings.
- 10.1.8. Policy CC3 on tall buildings identifies that tall buildings will be acceptable along the Golden Mile and will be defined through the GWC Local Plan Review and requires tall buildings to adhere to high standards of design.
- 10.1.9. Draft Local Plan Policy GWC5 expects development proposals to include good design measures to optimise land use and mitigate against potential impacts between co-location of employment and residential uses in line with the Agent of Change principle as well as responding to the area's sensitive heritage assets and important views, according with the Great West Corridor Masterplan heights and design framework. Draft Policy P1 states that development which responds to the area's sensitive heritage locations and important views, delivers design excellence and contributes positively to creating a strong sense of place will be supported.

RENOWNED ARCHITECTS

- 10.1.10. Leading London housebuilder, St Edward, appointed renowned architects Patel Taylor as lead designer on the scheme. Patel Taylor is an award-winning architectural practice based in Clerkenwell and founded by Pankaj Patel and Andrew Taylor in 1989. The practice has a proven track record in designing exemplary residential, mixed-use and workplace developments, and are currently designing some of the UK's largest urban land transformations.
- 10.1.11. St Edward approached Patel Taylor with the vision to deliver a wider regeneration of the Syon Lane community and asked them to develop ideas for the regeneration of the Homebase site in order to deliver:
- ▮ A landscape-led placemaking strategy for the site that puts people first;
 - ▮ High quality urban design;
 - ▮ High quality public realm;
 - ▮ Improved connectivity and way-finding;
 - ▮ A new modern Tesco store where the current Osterley store can be decanted to;
 - ▮ High quality architecture;
 - ▮ A range of homes of different size and tenures; and
 - ▮ New dedicated spaces for the local community.

DESIGN RATIONALE

- 10.1.12. A placemaking strategy has been developed to ensure the development is accessible, vibrant attractive and provides a place where people want to visit and live. The regeneration of the Homebase site relies on four main principles to create a successful place; including; capitalising on the regeneration opportunity, creating a unique retail offer, improving connectivity and public realm and introducing high quality architecture.
- 10.1.13. As the Design and Access Statement sets out, a design-led approach has been taken which enhances the quality of the place within the development itself and within the neighbourhood as a whole. The development seeks to respond to the aspirations of the emerging GWC Local Plan Review Plan to create a place with character and a distinct identity, but which integrates with the surrounding area.
- 10.1.14. Site analysis has been undertaken to ensure the lived experience of the new population is optimised, whilst also ensuring the public realm and pedestrian and cyclist experience around the site and towards the station is enhanced in line with the GWC Local Plan Review.
- 10.1.15. There have been ongoing improvements to the scheme, taking into consideration the extensive public consultation, pre-application advice and design review panel discussions but also with a view of optimising the development potential of the site and recognising the strategic opportunity.
- 10.1.16. The key design features have been influenced by an assessment of the site and surrounding context, a review of the GWC planning context, as well as feedback received during the consultation and this is discussed in turn below.

DENSITY AND SCALE

Responding to the existing context

- 10.1.17. There are a number of tall buildings and structures concentrated along the A4 and M4 corridors which date back to the early development of the GWC including the Gillette Building, north of the site and the JCDecaux building adjacent. These buildings are reflective of the area's former industrial use which were designed to be visible from important transport corridors. There are also large modern structures at the Sky Campus, GSK building and the Allianz building. The taller buildings create a distinctive skyline and contribute to the existing character of the area as identified in the Townscape and Visual Effect Study (Chapter 8 of the Environmental Statement).
- 10.1.18. The current Homebase store comprises of a large industrial style shed with metal cladding. The building is effectively two storeys high with a central pylon to the front which is visible in many views towards the site and is identified in the Hounslow Urban Context and Character Study (2014) as a 'landmark'. Landmarks are defined in the Hounslow study as:
- “prominent elements which by virtue of their height and/or mass are highly distinctive relative to their surrounding environment...create distinct visual orientation points...provide a sense of location within the larger townscape and may act as markers of other elements, often unintentionally.”*
- 10.1.19. The supporting text to Policy CC3 of the adopted Hounslow Local Plan suggests that tall buildings in the Borough are considered to be buildings of over 20m in height. Therefore, the proposed development would contain some tall buildings using this definition.
- 10.1.20. A thorough assessment covering long-range, mid-range and immediate views from various important townscape locations have been agreed with the Council to assess the impact of the tall buildings. It was concluded that the collection of buildings would create new backdrop to views, which would result in an improvement to the visual receptor's view, the townscape along the GWR and the emerging Great West Corridor character. Details of the conclusions of the Townscape and Visual Impact Assessment can be found in **Section 11** of this Statement.
- 10.1.21. Taking into account the existing site-specific context, it makes it appropriate location for a taller exemplary development which is highly distinctive to reflect the significance of the location. It will provide a strong sense of place and marker for people coming from the station. The tall buildings on the site will work towards providing an entrance to mark the western gateway of the Great West Corridor.
- 10.1.22. Aside from the existing context, the site is also allocated within an emerging Opportunity Area within The Intend to Publish London Plan and in the emerging GWC Review Plan where significant change has been identified.

Responding to the emerging GWC context

- 10.1.23. The Great West Road (A4) has been and continues to be major arterial route to the west of London, and the north-south orientation of Syon Lane creates a notable crossing point. In addition, the site is immediately adjacent to Syon Lane railway station, a key transport node and both the emerging London Plan and emerging GWC promote the effective use of land and higher density development around such locations.

- 10.1.24. The GWC Masterplan and Capacity Study is an evidence base document to the emerging GWR Review Plan and provides a height framework for new buildings in the GWC and considers the potential impact on heritage assets, both within the corridor and beyond. The Masterplan suggests average building heights of five to eight storeys in this location. Section 7.6.3 also states that for the Homebase site should propose shoulder heights of 16m at the interface with existing housing on Syon Lane and that the rear of the site could step up to 24m (up to two setback storeys).
- 10.1.25. Within the emerging GWC Local Plan Review the Council is promoting focal tall buildings of similar heights (61 to 82 metres AOD) at eight locations – Golden Mile Station, Brent River Quarter, The Mille Site, Phoenix Site, Lionel Road Station, Capital Interchange Way, Chiswick Roundabout and on the Tesco Osterley Site – in addition to tall building clusters around Golden Mile Station, Brent River, London Gateway, Brentford Stadium West and Brentford Stadium East.
- 10.1.26. Although the Homebase site is not identified for a focal tower building, the general picture is one of significant change and increasing heights and densities along the Great West Road. Recent applications permitted heights of up to 16 storeys at the 1-4 Capital Interchange Site highlighting the revitalisation and next chapter of the GWC. The proposed development's delivery of height on the site is in line with the Council's approach to higher densities in the GWC and the site as an entrance to the GWC area.
- 10.1.27. It is important to note that the Masterplan and Capacity Study is only an evidence base document to support the emerging GWC Review Plan which has not been submitted to the Secretary of State and not gone through examination, so does not hold significant weight.
- 10.1.28. Furthermore, to respond to the aspirations and its design vision for the West Area, the majority of the Syon Lane elevation has a shoulder height of four storeys, interspersed by taller elements which have narrower profile fronting onto Syon Lane. Blocks D and E have been stepped down to Syon Lane and by increasing the separation distances between the blocks, this helps to break-up the massing, and adds visual interest to the skyline. By stepping down the buildings on Syon Lane, this will help the scale of the proposed development to respect the desired character of the locality, and the presence of the Grade II Gillette Building in the townscape. The taller elements of the scheme have been positioned towards the south east elevation, away from the Gillette Tower and the nearby residential context, as well as views from Syon and Osterley Parks.
- 10.1.29. The use of taller buildings on the site means that the public realm areas at ground floor and communal amenity space on the podium can be maximised whilst continuing to achieve the optimum density on the site and contribute to the supply of housing. The use of varying heights also allows a sense of place and variety across the site, ensuring a high-quality design in line with adopted and emerging Council policy and Draft Policy D9 of the Intend to Publish London Plan.
- 10.1.30. The spatial hierarchy of the site is defined through its location within the Great West Corridor and the existing and emerging tall buildings that are/will be located here. It has been important to respect the heritage assets, mainly the Gillette Tower, and ensure that the development does not interfere with the autonomy of this asset.
- 10.1.31. The redevelopment of the site offers a major opportunity to improve and intensify this brownfield site as part of this growth corridor meeting the aspirations of the GLA and LB Hounslow. The proposed height of the development would optimise the delivery of housing in the Opportunity Area and make the most efficient use of the site. The site exists at an important junction on the Great West Road and through the developments size and presence it will help celebrate this corner.

10.1.32. In line with the adopted and Intend to Publish London Plan and Hounslow Local Plan policy, the specific massing distribution and density of the site has been developed taking into account the existing and emerging built and policy context of the site. The form of the proposed development has also been articulated through extensive pre-application discussions with both the GLA and LB Hounslow.

MASSING APPROACH

10.1.33. As set out in the Design and Access Statement, the massing strategy has been designed to:

- ┆ Create a building that integrates in the local context and wider townscape setting;
- ┆ Create a positive relationship between the building and the local heritage;
- ┆ Carefully consider the impact on the skyline and the relationship with the surrounding context;
- ┆ Make a townscape contribution to the local area;
- ┆ Deliver a high-density housing development which maximises the number of homes including affordable dwellings;
- ┆ Maximise the amount of open space; and
- ┆ Address daylight and sunlight impact on the neighbouring properties.

10.1.34. Therefore, the massing approach taken has been the following:

- ┆ Building A ranges from six storeys at the junction with the A4 and adopts a curved footprint which then steps up to provide a prominent corner for the Tesco entrance, whilst also addressing the historic Gillette Building by being stepped back.
- ┆ Building B is the tallest part of the development at 17 storeys which creates a gateway into the GWC and addressing the changing grain of the Opportunity Area developments to the north and east. It has been designed so that it does not interfere with the local views of Gillette Building.
- ┆ Building C is a ten-storey building marking the arrival at the corner from Syon Lane Station and a communal entrance for the residential element.
- ┆ Buildings D and E is a part-seven/part-eight storey which is stepped back to address the existing residential context at Northumberland Gardens and arranged perpendicular to the road to protect sunlight and daylight experienced in the properties at Northumberland Avenue; and
- ┆ Buildings B2B3 is an eight to 15-storey building which has been designed to create a new street frontage along the eastern edge of the site and to arrange bulkier aspects away from the local views of Gillette Building.

10.1.35. The massing approach has been developed to respond to feedback received during the consultation and pre-application discussions being mindful of adjacent residential properties to protect their amenity, in particular, the massing has been redistributed so there is less of an impact on the properties opposite on Syon Lane.

10.1.36. As mentioned above, reducing the height of the tallest tower element and buildings facing Syon Lane (Blocks D&E) and setting back upper levels and articulation has ensured less sense of street enclosure to minimise daylight and sunlight impact to neighbouring residential buildings, whilst not harming views of the Gillette Building.

10.1.37. The majority of the Syon Lane elevation has a shoulder height of four storeys, interspersed by taller elements which have narrower profile fronting onto Syon Lane. By increasing the separation

distances between blocks D& E, this has also help to break-up the massing and adds visual interest to the skyline when viewed from Syon Lane.

- 10.1.38. The setting back of upper levels of corner building A has also worked towards softening the view looking westwards on the eastern approach to the Site on the A4. The development will step up from Syon Lane to greater height on the eastern boundary of the site. The massing and height of proposed buildings in the backdrop of the Gillette Building has been adjusted to preserve its pre-eminence in views from the area around the site.
- 10.1.39. The evolution of the scheme has had regard to heritage considerations in particular the setting of the adjacent listed buildings including the Gillette Building and Registered Historic Parks and Gardens such as Syon and Osterley Parks. The effect of the height and the visibility of the proposed scheme on the setting of heritage assets has been carefully tested by means of visualisation of the scheme from a wide range of viewpoints. The proposed layout also incorporates feedback on orientation and positioning so as not to dominate adjacent listed buildings, including the Gillette Building and to protect key views from Syon and Osterley Parks.
- 10.1.40. As set out in the Heritage Report and the following sections, the proposed development will change the settings of adjacent heritage assets because of its visibility and presence, however, the heritage value of the buildings does not rely on an unchanged setting and it is not necessarily harmed by the presence of the new development. Furthermore, there are several townscape and placemaking benefits in the visibility of the new development, such as defining the urban block, the high quality architecture and public realm which will be beneficial. There is a clear challenge in achieving this kind of step change on the Homebase site whilst also respecting the existing historic context.
- 10.1.41. As part of the design evolution, alternative design options have been considered where heights would be lowered across the site. However, these options would not have been able to deliver all the benefits of the current scheme such as a significant contribution of affordable housing, a replacement, modern and more energy efficient Tesco store, new active frontages and improved public realm, over one acre of residential amenity space within communal podium gardens and enhanced green routes to connect the site to the station and the wider area.

DESIGN

- 10.1.42. The DAS recognises that the current building on the site does little to contribute to the surrounding townscape. The Development's vision is to kick-start regeneration of the GWC with landmark architecture that celebrates the existing grand art deco factories and provide a much greener landscape. The supporting DAS establishes three key design principles that include:
- ┆ Public realm: improving connectivity and wayfinding;
 - ┆ Retail podium: animating public realm;
 - ┆ A collection of buildings: reconciling the urban grain; and
 - ┆ The architecture attempts to bring together the coarse urban grain of the north and eastern extent of the GWC, which is almost entirely non-residential frontages constituting large commercial plots, with the finer grain of the residential development terraced housing to the east and south.
- 10.1.43. The design of the scheme has been inspired by local industrial art deco in the vicinity of the site as it was considered there was a clear opportunity to weave the area's historic industrial past into the design. As part of the design process, a thorough analysis of the Art Deco architectural language

has been carried out. This study included the industrial buildings along the Golden Mile stretch of the Great West Road as well as traditional and contemporary residential art deco buildings in London.

10.1.44. As a conclusion of the assessment, the following common facade articulation and composition elements have been identified:

- ▮ Predominant horizontal lines;
- ▮ Emphasised corners by curving or chamfering;
- ▮ Corner windows;
- ▮ Mixture of brick and white render;
- ▮ Brick banding;
- ▮ Industrial buildings have a grand celebrated entrance; and
- ▮ Some industrial buildings include a marker element, such as the tower in the Gillette factory or the clock element on the JC Decaux building.

10.1.45. The architectural proposals are exciting, and the collection of buildings and typologies are inspired by the Art Deco legacy of the context and provide multiple points of aesthetic interest whilst not attempting to dominate the local character. The streamlined appearance, grouping of storeys separated by horizontal banding, vertical articulation and curve in the corner block at the Syon Lane/A4 junction (Block A), and the stepping of this block helps break down the overall massing of the scheme while still creating a landmark development with a suitable presence for this key location. The corner building will serve as a key landmark to signify the entrance to the Great West Road and arrival at Syon Lane Station.

10.1.46. The perimeter block and podium design proposed will create a more defined street edge and active frontages. The proposed cascading gardens from the podium to the street level will soften the elevation, breaking up the massing and will provide an opportunity for attractive planting and enhanced biodiversity.

10.1.47. The architectural language of Building B1 (tallest building) draws on the Art Deco legacy with primary horizontal banding and primary vertical articulation and secondary vertical fins. The elevations have been developed to include inset open balconies to break up and give a residential feel to the facades.

10.1.48. Block D and E, on Syon Lane are articulated as a pair of buildings which have the same architectural articulation and appearance. The design has been developed so they are more articulated and finely detailed gable facades comprising glazed brickwork to contribute to visual interest.

10.1.49. Building C is articulated to create an arrival for the residential lobby and includes a tall glazed entrance with base massing articulation, metal framing holding the balconies and horizontal banding. The material has been selected to give a residential character to the block.

10.1.50. To respond to comments received during the pre-application meetings, Building B2 and B3 (eastern façade) have been further articulated to create an interesting skyline and avoid a wall effect along the Great West Road. Buildings are articulated in different blocks to break up the massing and articulated with indents to create dual aspect and hold the balconies. The style transitions from the Art Deco building B1 (rounded and chamfered corners, corner windows, horizontal banding, metal detailing) to the more traditional domestic architecture of B2 and B3: a combination of cream and red brick integrated with white brick banding.

- 10.1.51. The proposed material palette has been selected to provide a sympathetic relationship with the surrounding context, as well as uniting the buildings with key features which are integrated into each of the building typologies. This is discussed in detail within Chapter 9 of the DAS, and in summary includes brick cladding as the predominant façade material and white metal and bronze coloured metal is used for the window frames and balconies. The range of brick colours has been selected to express the building articulation as well as to create a distinctiveness to the blocks themselves.
- 10.1.52. The high-quality building materials have been carefully considered and have been sustainably sourced as is Berkeley Group requirement. All of the materials will comply with the relevant building regulations and standards.

11

TOWNSCAPE AND VISUAL EFFECT



11 TOWNSCAPE AND VISUAL EFFECT

- 11.1.1. This section sets out the policy context and assesses the townscape and visual impact that have been intrinsic to the evolution to the design of the proposed development. It then goes on to justify how the final design of the scheme will fit in to the existing townscape and views.
- 11.1.2. The Design and Access Statement (DAS), Heritage Statement, and the Townscape and Visual Impact Assessment (Chapter 8 of the Environmental Statement) which are submitted alongside this Statement provide further explanation and justification for the townscape and visual impact.

POLICY CONTEXT

- 11.1.3. The NPPF promotes a presumption in favour of sustainable development. Paragraphs 124-132 focus on achieving well-designed spaces and seeking to promote good design of the built environment. Paragraph 130 states that development should be refused if it fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 11.1.4. To support this, the National Design Guide states that “*well-designed places have individual characteristics which work to create its physical character*” and establishes ten characteristics to nurture and sustain a sense of community. Of particular relevance to undertaking this assessment is the characteristics ‘Context’ and ‘Identity’.
- 11.1.5. Adopted London Plan Policies 7.11 and 7.12 concern the London View Management Framework which identifies a list of strategic views designated by the Mayor that requires new development to be assessed for its impact on the designated views and not harm but make positive contributions to the characteristics of strategic views and their landmark elements.
- 11.1.6. Intend to Publish London Plan Policy HC3: ‘Strategic and Local Views’ and Policy HC4: ‘London View Management Framework’, consider development proposals within both strategic and borough views.

ASSESSMENT

- 11.1.7. Townscape and visual analysis have been undertaken during the evolution of the design development of the proposal and a Townscape and Visual Effect chapter included at Chapter 8 in the Environmental Statement has been submitted to support the proposal.
- 11.1.8. The Townscape chapter considers the short, medium and long-distance townscape and landscape representative views to the site and have been agreed in advance with Hounslow design officers. A selection of the views identified within the emerging GWC Local Plan Review: Appendix View Assessment were tested as part of the evolution of the proposed Development. It considers a 2.5km study area.
- 11.1.9. It notes the LBH’s Urban Context and Character Study splits the borough into ten districts. The site falls within the Brentford district, but the study area also includes the districts of Isleworth and Osterley & Spring Grove. The townscape assessment has considered findings of the Urban Context and Character Study to inform its assessment.
- 11.1.10. The assessment notes that the topography of the site generally falls from the Great West Road to the north, down towards the site’s southern boundary towards the railway line. It notes due to the

site and surrounding area's landform, vegetation and built form, the likely visual receptors who have the potential to be affected by the proposal include:

- ┆ Residents in properties located adjacent to the site and within 500m of its boundary, where associated windows are orientated towards the site;
- ┆ Users of public open space located within 2.5km of the site; and
- ┆ Users of public highways and rights of way located within 2.5km of the site.

11.1.11. Consideration was given to the location of these visual receptors in determining representative views along with regional and local planning policy and guidance. At a local level, the adopted plan recognises 'local views' within the spatial strategy diagrams for the ten districts within the borough and within the Urban Context and Character Study and conservation area appraisals.

11.1.12. Further views that are considered within the assessment are identified in the emerging GWC Local Plan Review: Appendix View Assessment document. These include the following views orientated towards the site:

- ┆ Linear view towards the Gillette Building from Syon Lane Station (SS1);
- ┆ Panoramic views from Syon Park (SP1, SP2, and SP3);
- ┆ Panoramic and linear views from the Royal Botanical Gardens (BG4, BG7, BG9, BG10, and BG11);
- ┆ Long view from Osterley Park (OP1); and
- ┆ Boston Manor, view from the rear Boston Manor House (BM2).

11.1.13. Accurate Visual Representations (AVR's) have been prepared to inform the TVIA's visual assessment and have been prepared for each of these tested views. They were chosen to give an impression of the maximum effect of the proposal in the viewing experience and they are kinetic and variable in nature. The methodology for undertaking the assessment and views chosen were agreed with LB Hounslow Officers through extensive pre-application discussions.

CONCLUSIONS

11.1.14. Upon a review of the baseline conditions the Townscape and Visual Effect Chapter established that the TCA1: GWR Corridor, which the Site currently falls within is dominated by the major transport corridor which has limited sense of enclosure due to the set-back for parking to the front of commercial buildings. The TVIA notes that the proposal falls at the operational stage would result in a minor to moderate beneficial effect on TCA1: GWR Corridor. This is due to it improving the existing townscape situation through providing a new perimeter block, improved public realm and architecture that reflects and builds on the existing Art Deco buildings that currently address the GWR.

11.1.15. Glimpsed views to the proposal are likely to be visible and lead to indirect effects on TCA4: Brentford and South Ealing residential and TCA5: Osterley, Spring Grove and Isleworth residential and to a limited extent from TCA2: Osterley & Spring Grove non-residential, TCA6: Osterley Park and TCA7: Arcadian Thames and historic landscapes. Resulting in a minor beneficial or neutral indirect effect to TCA4: Brentford and South Ealing residential, TCA5: Osterley, Spring Grove and Isleworth residential, TCA6: Osterley Park and TCA7: Arcadian Thames and historic landscapes and a negligible and neutral indirect effect on TCA2: Osterley & Spring Grove non-residential. The proposal will not affect TCA3: Historic Brentford and Isleworth.

- 11.1.16. Due to the relatively flat landform present the proposal's ZTV would extend and views would be possible beyond the existing situation. Within the immediate context the proposal would provide a clearly defined, improved, edge to the surrounding roads of Syon Lane and GWR. Variation in the colour of the brick façade and approach to architectural treatment would provide a high level of visual interest. It would form a new backdrop to views, which would result in an improvement to the visual receptor's view, the townscape along the GWR and the emerging Great West Corridor character.
- 11.1.17. The proposal's proposed massing provides a step-in height away from the lower built form present within the residential townscape to the south and west of the Site. It also retains views to the former Gillette Building's clock tower from Syon Lane Station.
- 11.1.18. Linear views would also be possible from the roads orientated towards the proposal such as the GWR, Northumberland Avenue and Syon Lane itself. These would vary subject to the viewers proximity to the Site. From sections of the GWR the proposal's Building A and B1 would terminate the wide, open, linear view and positively mark the western entrance to the Great West Corridor.
- 11.1.19. The potential effect of views from within publicly accessible areas of open space were also considered within the assessment. This established that glimpsed kinetic views would be possible from sections of Park Road and within Syon Park to the upper floors of the proposal. Where visible the differing approach to the proposal's façade material and application of the detailed architectural treatment on the building typologies would result in a layered and modulated built form in the background of the view. The proposal would fall behind the trees that frame the park and would not detract the visual receptor's appreciation of the features within the fore and middle ground of the view.
- 11.1.20. Further views were considered within Boston Manor and Osterley Park, which concluded that the proposal would result in a very minor alteration to the views within these areas and mark the western entrance to the Great West Corridor. Importantly the proposal would not detract the visual receptor's appreciation of the pasture field's associated with Osterley Park or the formal lawns and evergreen specimen conifers associated with Boston Manor.
- 11.1.21. It is considered that views would also be possible from the surrounding properties that have windows that overlook the proposal and raised vantage points. Within these views the proposal would positively mark the western gateway of the Great West Corridor.
- 11.1.22. The proposal would not be visible within the formal or designed views and vistas within the Royal Botanic Gardens, Kew WHS. It would also not be visible within the identified vistas set out within the Thames Landscape Strategy.
- 11.1.23. This will lead to the following effects on the representative views:
- ¡ Moderate to Major Beneficial (significant) – RV1 Syon Lane Station;
 - ¡ Moderate Beneficial or Neutral (significant) – RV2 Northumberland Avenue, RV4 GWR Firestone entrance and RV15 Syon Park southern entrance footpath (south);
 - ¡ Minor to Moderate Neutral – RV14 Syon Park southern entrance footpath (north);
 - ¡ Minor to Moderate Beneficial – RV3 Grant Way roundabout;
 - ¡ Minor Neutral – RV7 Osterley Park (footpath), RV8 Osterley Park (centre), RV11 Boston Manor, RV13 Syon Park (Gate Lodge) and RV25 Syon Park House; and
 - ¡ Minor Beneficial– RV5 GWR outside no.772, RV6 GWR central reservation and RV26 GWR outside West Link House.

- 11.1.24. The cumulative impacts of nearby schemes are also assessed, in line with Environmental Impact Assessment regulations. There are effects identified, as is to be expected, from the Tesco Osterley site given its proximity to the Homebase site. The benefit of the two sites being part of a strategic opportunity is such that their design and consideration of townscape is able to be joined up and therefore propose the optimum solution for the area.
- 11.1.25. The results of the townscape assessment, presented in this chapter, identify that the development will be visible from the local area and have impacts of varying significance on local townscape areas and key views. This impact is considered to be minor to beneficial and representative of the emerging context of the Great West Corridor, which already appears in the periphery of key open spaces in the area such as Osterley Park and Syon Park. The proposed development does not impact, either solely or cumulatively with other schemes, on the Royal Botanic Gardens/Kew World Heritage Site.
- 11.1.26. Further details of the impact of different representative views can be found in the supporting Townscape and Visual Effect Chapter included within the Environmental Statement.

12

HERITAGE



12 HERITAGE

- 12.1.1. An understanding of the heritage assets has informed the design of the proposed development. The key elements of the design that have been influenced by an understanding of the heritage assets are discussed within this chapter along with an assessment of the heritage impacts of the proposed development. A full assessment is provided within the Heritage Statement and Built Heritage Assessment (within the ES) prepared by KM Heritage submitted as part of the application.

LEGAL DUTY TO PRESERVE

- 12.1.2. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. Section 72 requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.
- 12.1.3. As set out in the site description section, there are listed buildings near to the site around the junction of Syon Lane and the A4 symbolising the industrial history of the area including the Grade II art deco Gillette Building located across the Great West Road and the Grade II NatWest Bank. Nearby to the north east of the site, is another Grade II Listed Building (former Coty Factory), now used as the Syon Clinic.
- 12.1.4. The wider surrounding context also includes a number of highly graded designated heritage assets and registered landscapes. To the west, is Osterley Park, a Grade II* Registered Historic Park and Garden, which includes Grade I listed Osterley House and other heritage assets. Similarly, Grade I listed Syon Park to the south is a registered Historic Park and Garden and includes Grade I listed Syon House and other heritage assets. Kew Gardens World Heritage Site is situated further south-west on the other side of the River Thames and the nearest point to the site is at a distance of 1.5km. There are also other highly graded assets further afield such Boston Manor House (Grade I) and Quaker Meeting House, Quakers Lane (Grade II*).
- 12.1.5. The site is not located within a conservation area, however there are conservation areas nearby. To the north, Boston Manor Park falls within the Great Union Canal and Boston Manor Conservation Area and Grade I Listed Boston Manor House. Other nearby conservation areas include The Butts, Isleworth Riverside, Osterley Park and Spring Grove.

POLICY CONTEXT

- 12.1.6. Paragraph 189 states that the applicant should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance. Paragraph 190 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal.
- 12.1.7. Paragraph 192 of the NPPF explains that, in determining applications, local planning authorities should take account of:
- i The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

- i The positive contribution that conservation of heritage assets can make to sustainable communities; and
 - i The desirability of new development making a positive contribution to local character and distinctiveness.
- 12.1.8. Paragraph 193 explains that, when considering the impact of a proposed development on the significance of a heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be.
- 12.1.9. Paragraph 195 of the NPPF states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh harm.
- 12.1.10. Adopted Local Plan Policy CC4 and emerging Policy GWC5 of the emerging GWC Local Plan Review states that the council will promote heritage-led regeneration and redevelopment, particularly where this brings long-term value and a sense of place to the development, such as along the Golden Mile. However, the proposals should respect and enhance the Corridor's area's including designated heritage assets and their setting.
- 12.1.11. Adopted Local Plan Policy CC4 (q) states the proposals should conserve and enhance the internationally recognised Outstanding Universal Vale of the Royal Botanic Gardens Kew World Heritage Site, its buffer zone and its setting, including view to and from the site.

UNDERSTANDING OF SIGNIFICANCE

- 12.1.12. An understanding of the significance of the heritage assets is set out in the Heritage Statement. The significance of the development is assessed against the heritage context of the site, that largely comprises of in the first instance, designated and non-designated heritage assets within the immediate vicinity of the site (Syon Clinic and Gillette Building etc) and in the second instance the impact on highly graded designated heritage assets further afield (Kew Gardens and Grade I and II* registered landscapes and their Grade I listed buildings) that have the potential to be affected due to the scale of the proposed development.
- 12.1.13. KM Heritage assess the significance of nearby heritage assets, taking into consideration both the basis of the current and emerging context. The relationship of the surrounding buildings is testament to the western urban expansion of London and the growth around Great West Road. The mixture of buildings that are within and part of the setting of nearby Conservation Areas must be appreciated, ranging from designated and non-designated buildings of high architectural and aesthetic value to those that are actually harmful to the existing setting such as the retail sheds that lie on the Tesco and Homebase sites at present.
- 12.1.14. The immediate heritage assets identified above possess varying degrees of aesthetic significance by virtue of their design and appearance. Aesthetic significance derives from the display of certain styles of architecture, such as Art Deco style of the Gillette building and others around it on the A4 and the linked qualities such as materiality. Although it notes that they are very much object buildings of note in an otherwise incoherent and mundane environment dominated by traffic and lesser quality later developments that detracts from their special interest.
- 12.1.15. The current Homebase building cannot be said to support the significance or character of the Gillette building. It contains a single large and blank building surrounded by surface car parking is similarly

unsympathetic, which detracts from the older listed buildings in the vicinity. It's occupation of its site reinforces the 'subtopian' character of this part of the Great Western Road and underlines the placeless quality of the built environment in its current form.

- 12.1.16. Beyond the local context, there are large, highly listed assets that form part of the wider context to the site, such as the Kew World Heritage Site, Osterley Park and Syon Park. These also contain highly regarded listed buildings. KM Heritage identifies that neither Syon House or Osterley House are country houses in this classic sense anymore, nor have they been for some time, as can be seen by the way London has developed around them. The city is clearly perceptible beyond the boundary of the heritage assets. However, the integration of the houses and landscapes, and the views from the houses, is the primary relationship that contributes to their significance.

INFLUENCE OF HERITAGE CONSIDERATIONS ON PROPOSED DEVELOPMENT

- 12.1.17. The design has been informed by extensive heritage and townscape analysis which assesses the impact on the setting of the nearby listed buildings and wider designated landscape areas. Consistent visual analysis has led to the optimal modulation of height on the site in response to views from the wider area such as Osterley Park and Syon Park.
- 12.1.18. The impact on heritage assets has been carefully considered as part of the design evolution and through pre-application discussions with key stakeholders. The subsequent quality of design in the proposed development is high and this is a key part of the vision for the site.
- 12.1.19. The design of the proposal has paid particularly attention to the variation in heights across the site which is intended to minimise the impact on neighbouring developments and nearby heritage assets. This is particularly relevant when considering the Grade II listed Gillette Tower, as the distribution of massing and height has been adjusted to preserve its pre-eminence in views from the wider area. In fact, the reflection in massing on eastern edge of the site is intended to emphasise the listed building's significance. Being the closest and most perceptible listed building to the site, this has been a significant tenet of the design strategy.

IDENTIFICATION OF EFFECTS

- 12.1.20. As set out in the Heritage Statement, the assessment of effects on heritage assets cannot be confined to the idea that no change means no harm, and therefore any change leads to harm. When considering the impact on the setting of heritage assets, the visibility of a building is not in itself harmful.
- 12.1.21. The development does change the setting of heritage assets assessed through the visibility and presence of the scheme. This is not inherently harmful and the visibility of new development in the skyline is often a positive signal for regeneration and a reflection of a changing area.
- 12.1.22. For designated and non-designated heritage assets in the vicinity of the site, the proposed development is found to begin a process of place-making that will support a more favourable context for the heritage assets in the vicinity of the site. The scale of the development is greater than the existing context, but this in itself is not representative of any harm.
- 12.1.23. As noted above, the effect of the height and the visibility of the proposed development on the setting of heritage assets has been carefully tested by means of visualisation of the scheme from a wide range of viewpoints, including from within Osterley Park and Syon Park.

- 12.1.24. The analysis in the Heritage Report demonstrates that the proposed development would not appear in the principal designed views from either landscape or would not be visible at all from Osterley House itself. From Syon House, the development would just appear, with the redevelopment of the Tesco site, at the far right of the view from the west-facing entrance to Syon House, largely obscured by trees and the Grade II Former Riding School. The Great Lime Avenue is, logically and experientially, the most important view on the western side of Syon Park. The presence of the development within other views in the park is of inherently less significance, even where it is seen in the backdrop of other listed structures.
- 12.1.25. In any event, the heritage significance of both Osterley and Syon does not rely on an on empty skyline, as is demonstrated by the presence of the Gillette Building and other modern development. The significance of their constituent heritage assets remains wholly intact with these developments visible in their settings.
- 12.1.26. The proposed development would change the setting of heritage assets in the surroundings of the site by virtue of its visibility and presence. Visibility does not equate to harm. Its visibility will be beneficial for specific townscape reasons and the potential for the site to contribute to placemaking and wayfinding.
- 12.1.27. The Heritage Report concludes that the proposed scheme has the capacity to begin a process of place-making that helps to create a more favourable context for the heritage assets in the vicinity of the Site. The site exists at an important junction on the Great West Road and by responding to the size and presence of the Gillette Building, will both help (in conjunction with the Tesco Osterley scheme) to mark that corner and emphasise the significance of the Gillette building's location. The scale of the proposed development is clearly greater than the listed buildings in the vicinity, but the special interest of these designated heritage assets does not rely on a specific scale on the site, and their visibility along the A4 remains largely unimpeded.
- 12.1.28. We appreciate there is some change caused by the visibility of the proposed buildings from Syon Park and Osterley Park. The views of KM Heritage have established that visibility is not in itself harmful to what is significant about the parks, and indeed built form is already visible in various locations from each of these parks.
- 12.1.29. However, it is also appreciated that the nature of visual effects is subjective and can be open to interpretation. KM Heritage, with reference to the form of the proposed development and the nature and quality of architecture, has concluded that the visual effect would cause no harm to significance. It should be noted that harm is subjective, and others may conclude that the visibility of buildings from Osterley Park and Syon Park constitutes less than substantial harm to their significance. If less than substantial harm is perceived, it is considered this is outweighed by public benefits set out below, in accordance with Paragraph 196 of the NPPF.
- 12.1.30. Notwithstanding the above assessment, pre-application discussions with the Council and Historic England have requested that the public benefits of the scheme be set out, to account for the possibility of the scheme being assessed by either party as having less than substantial harm.

PUBLIC BENEFITS

12.1.31. The proposed development would deliver substantial public benefits:

- Delivery of 473 new high-quality homes, significantly contributing to Hounslow's increased housing target as set out in The Intend to Publish London Plan;
- A new and modern and sustainable Tesco store of circa 10,550sqm including a 200 sqm community space (GIA) with 137 sqm of flexible commercial, business and service space;
- 38% high quality, tenure blind new affordable housing, in accordance with the Mayor's Fast Track threshold approach;
- Over one acre of residential amenity space with biodiverse podium gardens including open space and children's play space;
- High quality architecture and a new landmark building to mark the entrance to the GWC;
- A significant improvement in biodiversity and focus on environmental and ecological enhancements;
- New active frontages and improved, safer public realm along Syon Lane and the Great West Road;
- A 36% reduction in carbon emissions and achieving BREEAM 'Very Good' for shell of Tesco, with endeavours for 'Excellent';
- Improvement to pedestrian environment across Great West Road and Syon Lane, enhancing the connection to Syon Lane station;
- Dedicated cycle friendly 'clean air' route will be provided between Syon Lane Station and the Great West Road via Syon Gate Way and new eastern street, Syon Gate Lane;
- Improvements to bus services and bus stops;
- Emphasis on green and sustainable travel with policy compliant cycle parking, improved cycle routes, two car club bays, and electric car charging points; and
- Investment in local infrastructure through the Community Infrastructure Levy and Section 106 contributions.

13

PUBLIC REALM



13 PUBLIC REALM

- 13.1.1. This section sets out the public realm and landscaping improvements which are intrinsic to the development proposed. It should be read alongside the Landscape Strategy.

POLICY CONTEXT

- 13.1.2. Paragraph 127 of the NPPF states that to achieve well-designed places, decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- 13.1.3. Policy 2.18 of the adopted London Plan states that development proposals are expected to enhance London's green infrastructure and incorporate elements of green infrastructure that integrate the wider network. The policy seeks to improve accessibility and develop new links, street trees and other components of urban greening.
- 13.1.4. Policy GWC3 of the draft GWC Local Plan Review states that the council will create high quality accessible places to improve mental and physical health and wellbeing, as well as reducing health inequalities by creating new high-quality, safe and accessible public squares, amenity spaces, open spaces and public realm designed to increase social interaction, innovation and promote play and physical activity.
- 13.1.5. Policy GWC5 of the draft GWC Local Plan Review goes on to state that the strong sense of place envisioned for the GWC will be created through a strong design-led approach, promoting positive enhancements to the quality of public realm with well-designed, generous pavements, landscaping, tree planting, a consistent palette of materials, furniture, public art, signage and lighting, enhancing the permeability of the area.

EXISTING PUBLIC REALM AND LANDSCAPE

- 13.1.6. The Homebase site sits in a prominent location at the junction of the Great West Corridor. The site largely consists of hardstanding with some semi mature trees along the boundary of the site on Syon Lane, and some low-level planting along the Great West Road. The south of the site is bound by a greater concentration of mature vegetation separating the site from the railway lines. The minimal greening of the site is in strong contrast with the residential properties to the west and south containing an abundance of vegetation in front and rear gardens. The site contains cluttered footpaths and suffers from unclear routes for pedestrians to manoeuvre through the site.
- 13.1.7. Overall, the existing landscaping arrangements on and leading up to the site are poor and do not make a positive contribution to the public realm and streetscape and is of little ecological value. Despite the site's position on the edge of the residential community of Syon Lane, to date the site has not aided the transition of the residential character to the west and south with the contrasting character of the Great West Road over the years. Public realm and landscaping enhancements are a key opportunity in St Edward's vision to bring together the mixed character of the area through this integral site.
- 13.1.8. The pre-application and DRP comments have been carefully considered to aid the preparation and further development of the public realm strategy. This has been informed by pedestrian counts from origin and destination points desire lines and street typologies.

GROUND LEVEL LANDSCAPING AND PUBLIC REALM IMPROVEMENTS

- 13.1.9. As a basis of creating a new and improved public realm, the key components for the landscaping vision as put forward have celebrated the site's prominent location as a new gateway destination along the Great West Road by introduction a circular network responding to existing and future movement patterns to facilitate optimum accessibility and connectivity.
- 13.1.10. The public realm strategy has ensured the proposed built development is set back from Syon Lane to ensure that this area is activated at ground floor for public benefit. To compliment the proposed Tesco store, the ground floor will feature an expansive plaza space at the southern corner of the Syon Lane frontage, which will provide a new tree-lined avenue along Syon Lane and raised planters with seating, responding to the pre-application advice received. This has been designed to improve the attractiveness of the public realm and draw people to this new destination. The enhancement of this portion of the existing streetscape will promote a healthy and high-quality public realm in line with Policy GWC3 of the draft Local Plan Review.
- 13.1.11. The new public plaza will incorporate an urban glade, amphitheatre seating steps, all orientated towards the main Tesco customer entrance lobby to improve inclusivity and bring together the mix of uses on the site. It will also help to align the site as a go-between between the residential area to the west and south with the new mixed-use development.
- 13.1.12. To benefit the future residential occupiers of the buildings, gateway features such as planting, and feature paving will combine with the architectural proposals to emphasise the key access points to the development.
- 13.1.13. The proposed design contributes to the creation of new clean air routes to the east and south of the site through the enhancement of Syon Gate Way, and the creation of a new pedestrian and cycle route along the eastern boundary at Syon Gate Lane and linking up to the south side of Great West Road.
- 13.1.14. The proposed development is surrounded on four sides by a public pedestrian pavement. The design of the street network and presence of demarcated footpaths will ensure a legible environment for pedestrians. The footpaths along Great West Road and Syon Lane include level and DDA compliant access to ensure suitable accessibility is available to all users.
- 13.1.15. To further enhance the accessibility and permeability of the newly landscaped space, and to ensure public benefits arise from the development proposals for future residents and the wider community, the existing subway from the north west corner of the site from Syon Lane through to Syon Lane on the other side of the Great West Road will be enhanced with a wider footpath and additional trees and vegetation leading to its entrance to improve its openness and visibility. The public realm improvements beyond the application site boundary are to be agreed via S278 / S106 legal agreement.
- 13.1.16. The steps above have been taken to improve the local streetscape with the aim to better accommodate the anticipated significant AM/PM peak commuter pedestrian flow between Syon Lane Station and the Sky Campus and further afield.
- 13.1.17. The improvements to the cycleway and pedestrian routes are designed to create a safe and secure route which will encourage a sustainable method of future travel in line with the aspiration of the GWC Local Plan Review and Policy GB7 of the adopted Hounslow Local Plan and Policy E5 of the Intend to Publish London Plan.

- 13.1.18. It is worth noting that together, the combined strategic opportunity for the Tesco and Homebase would deliver over 50% public realm of the overall site area.
- 13.1.19. The landscape masterplan for the Tesco, Osterley site has been split into a series of character areas. St Edward will be delivering a new pocket park and north of the river, landscaping will consist of retaining trees, wildflower meadow and native tree planting to support wildlife as well as play elements and seating. The area will also feature an amenity trail leading to the lake edge and viewing decks. The Clearing will act as an important civic space with public realm providing permeable links through to existing and the proposed communities. There will be an interactive fountain, raised planters with tree planting, a public square and an amphitheatre. This area will host a variety of activities in the daytime and evening.
- 13.1.20. The proposed improvements at the Homebase site align with the public realm and accessibility improvement objectives for the Great West Corridor, which is also wholly consistent with the aims of Policy 2.13 and 2.18 of the Adopted London Plan, Policy GWC3 and GWC5 of the draft Local Plan Review Plan and Intend to Publish London Plan.
- 13.1.21. St Edward's overall landscaping vision to create a new and attractive public realm will have positive health and amenity impacts for: customers using the Tesco store at ground floor; future occupiers benefitting from the podium gardens and courtyards; and pedestrians passing through the site to reach their destination. The public realm and landscaping enhancements stretch beyond the site boundary with the objective of making a positive contribution to Syon Lane and the Great West Road for years to come.
- 13.1.22. Full details of the proposed public realm and landscaping enhancements can be found in the Landscape Strategy submitted in support of this application.

14

RESIDENTIAL AMENITY



14 RESIDENTIAL AMENITY

- 14.1.1. This section sets out the key residential amenity considerations related to the proposal including privacy and overlooking, daylight and sunlight, noise and vibration and air quality.

POLICY CONTEXT

- 14.1.2. The Intend to Publish London Plan 2019 Policy D1B relates to optimising site capacity through the design-led approach. Part B of the policy states that developments should deliver appropriate outlook, privacy and amenity, also through mitigating the impacts of noise and poor air quality.
- 14.1.3. Assessments have been undertaken to ensure that the amenity of existing residential properties adjacent and the residential occupiers of the proposed development is protected, including achieving good levels of daylight and sunlight both internally and externally, as well as maintaining a good level of privacy. The proposed development includes a number of tall buildings which are set back at podium level to ensure satisfactory separation distances between habitable windows.

PRIVACY AND OVERLOOKING

- 14.1.4. Standard 28 of the Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring properties, the street and other public spaces.
- 14.1.5. In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces).
- 14.1.6. The Housing SPG states that these are useful yardsticks for visual privacy but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density.
- 14.1.7. The separation distance between the proposed development and properties opposite along Syon Lane is 40m, 65m north towards Horizon Court, and 65m south towards Brambles Crescent and so the recommended distance between these properties is satisfied. Furthermore, the distances between each block on site has been maximised and building width minimised to ensure that more than 50% of the building frontage above level 4 is open frontage with sky views to add visual interest and reduce the sense of enclosure when viewed from Syon Lane.
- 14.1.8. Within the site itself, although the distance between the individual blocks is quite narrow in some isolated parts of the site (between blocks. B1 and A1, A1 and E2 and A1 and E2), and the recommended 18m is not quite achieved, the layout of the building has been designed to avoid compromising privacy, and daylight and sunlight levels. Where this does occur, dual aspect homes have been maximised and windows staggered to avoid overlooking, as well as balconies avoided which further reduce separations. Furthermore, the compromised distances only affect a relatively limited number of habitable rooms, and these are mainly bedrooms which are less sensitive given the less time spent there compared to living rooms.

DAYLIGHT AND SUNLIGHT

- 14.1.9. Adopted Policy SC4 states that the LPA will expect development proposals to meet standards in the Building Regulations and Local Plan demonstrating compliance with prevailing daylighting standards (BRE Guidance 2011). Standard 14 of the Housing SPG goes onto state that where dwellings are accessed via an internal corridor, the corridor should receive natural light and ventilation if possible. Standard 32 also states that all homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.
- 14.1.10. Nevertheless, the Housing SPG notes that a degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new development themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE guidance suggests considering the use of alternative targets.
- 14.1.11. The submitted Daylight, Sunlight and Overshadowing and Solar Glare chapter in the ES has assessed the potential loss or gain in existing daylight and sunlight levels at the surrounding sensitive uses and changes to overshadowing as a result of the proposed development. The baseline daylight conditions, using the Vertical Sky Component (VSC) and No-Sky Line (NSL) test to the surrounding residential properties have also been assessed. The Assessment has been guided by the Building Research Establishments (BRE) Site Layout Planning for Daylight and Sunlight; A Guide to Good Practice 2011 and also by the NPPF guidance and policies set out in the adopted and Intend to Publish London Plan, as well as local policies.
- 14.1.12. The Vertical Sky Component (VSC) assessment is undertaken to the façade of the proposed buildings. This test involves splitting the façade into 1m grids and then calculating the VSC at the centre of each grid. The VSC test result can be linked to more detailed daylight tests, such as the Average Daylight Factor (ADF) test when the general size of the rooms and windows are known. We can also relate the VSC tests to advice given within the BRE guidelines which suggests:

VSC Level	Expectation
A VSC of greater than 27%:	Very Good Daylight Access is expected
A VSC between 18% and 27%:	Good Daylight Access is expected
A VSC between 10% and 18%:	Adequate Daylight Access is expected
A VSC between 10%:	Lower than expected Daylight Access is expected

Daylight and sunlight results – surrounding properties

- 14.1.13. The VSC baseline results show that in the current baseline, 85% of the surrounding properties (the majority of which are located to the west of Syon Lane) benefit from at least 27% VSC which in accordance with the BRE Guidelines (2011), is sufficient to give reasonable daylight amenity in an urban environment.

- 14.1.14. The NSL baseline results show that in the current situation, 99% of the rooms within the surrounding properties benefit from direct sunlight at working place height to in excess of 80% of the room area which, according to BRE Guidelines, is sufficient to give reasonable daylight amenity results in an urban environment.
- 14.1.15. All of the amenity spaces assessed currently enjoy good levels of sunlight above the recommended by BRE guidelines. The results demonstrate that the properties on Cherry Crescent and Rothbury Gardens will experience alterations which, in accordance with the BRE Guidelines, will not be noticeable to the occupants.
- 14.1.16. Whilst a number of windows will experience daylight/ and or sunlight reductions beyond BRE Guidelines, the retained levels of daylight and sunlight are considered acceptable and above the levels suggested by LBH. The effect can therefore be considered acceptable.
- 14.1.17. The properties in New Horizon Court will experience daylight alterations which beyond those described as negligible or minor. However, it is important to note that these properties were converted from office to residential uses under permitted development rights and so were not subject to the same design standards. They typically receive less daylight because of the balcony/overhang which cuts out light from the top part of the sky. The BRE guidelines state that even a modest obstruction opposite may result in a large relative impact on the VSC. The results of the assessment show that without the overhang in place, the window would experience a reduction which is within the BRE guidelines reduction criteria.
- 14.1.18. The properties on Northumberland Gardens and Brambles Close are likely to experience reduction which are of minor adverse/to moderate significance. It is important to note that the design of the scheme has been altered significantly and dropped down to seven to eight storeys on Syon Lane to ensure the daylight and sunlight experienced within these properties is not adversely affected. Although it has been demonstrated that there will be some minor adverse effect, the floorplans for these properties have been obtained for the majority of these dwellings and it can be seen that most of the windows affected are principally small secondary windows and not serving primary habitable spaces. When considering the overall effect, the results are considered to retain a good level of daylight for urban area.
- 14.1.19. The annual sequence images showed that there was the potential for solar glare to occur to the road users travelling north/north-west along Syon Lane, north-easterly along Northumberland Avenue and turning south-easterly onto Syon Lane from Great West Road, as well as, the train drivers travelling from a south-westerly and a north-easterly direction to the south of the Site. However, further detailed assessments at these locations show that any effect can likely be considered to either be negligible or, at worst, minor adverse which is not considered significant.

Daylight and sunlight results - Internal

- 14.1.20. An internal daylight, sunlight and overshadowing report has been prepared by Point 2 and this is included as Appendix 12.16 in the ES. The scope of the report is to consider the levels of daylight and sunlight that will be enjoyed by the occupants in the proposed development.
- 14.1.21. The assessment has been undertaken with regard to the London Borough of Hounslow (LBH) planning policy and the advice and recommendations set out in the Building Research Establishment (BRE) report entitled 'Site layout planning for daylight and sunlight: A guide to good practice' (Referred to in this report as the "BRE guidelines").

- 14.1.22. The results across all of the blocks show that approximately 96% of all of the proposed habitable rooms will enjoy good levels of daylight when using the target criteria of 1.5% for a Living/Kitchen/Dining room. This is considered a very good level of compliance for a proposed scheme of this size and density.
- 14.1.23. In addition, the NSL results show that approximately 88% of all rooms should enjoy a good level of daylight distribution in accordance with the BRE guidelines and a further 9% (97% of all rooms) of the rooms will enjoy a daylight distribution that is considered to be a good level of daylight distribution for an urban area (more than 50% of the rooms area). Again, this is considered a very good level of compliance for a proposed scheme of this size and density.
- 14.1.24. The APSH results show that 45% of the rooms will strictly meet the BRE guidelines, however, 54% of all rooms will receive a good level of sunlight for an urban area, with an APSH above 20%, and 61% of all rooms will receive an APSH above 15%. When looking at all rooms, 100% will be able to receive some sunlight during the year. Overall, the design of the proposals is therefore considered to ensure that acceptable levels of sunlight will be enjoyed for an urban area.
- 14.1.25. Those windows and rooms that receive lower levels of sunlight are typically set back behind balconies. However, a balance between the provision of the beneficial amenity space and the slightly lower levels of sunlight within the room needs to be struck. One also has to remember that the balcony itself will generally enjoy good levels of sunlight.
- 14.1.26. The north facing elevations will also typically receive lower levels of sunlight which is to be expected. However, to help mitigate the lower levels of sunlight enjoyed to the north facing flats, the ADF results show that these flats will be able to enjoy good levels of daylight. The overall daylight/sunlight amenity levels within each flat is therefore considered acceptable.
- 14.1.27. If the number of north-facing flats was reduced, it is likely that more massing would have to go on the southern boundaries of the site. This would have a much larger effect upon the neighbouring properties opposite as well as affect the views of the listed Gillette Building, and also potentially significantly reduce the level of sunlight enjoyed to the podium gardens. Therefore, it is considered the current massing arrangement is a good solution to balancing the different elements and to achieve a development which protects the amenities of both the surrounding residents and future inhabitants.
- 14.1.28. With regard to overshadowing, it is considered that each of the amenity spaces will be able to enjoy very good levels of sunlight in accordance with the BRE guidelines. Based on the daylight and sunlight tests undertaken by Point 2 surveyors, the results show that within the development itself, whilst not all rooms are likely to meet the suggested guidance), a very good proportion of the rooms (it is estimated to be 85% +) should be able to receive a good level of daylight in accordance with the BRE guidelines. This is considered a good result for a development of this size and density.
- 14.1.29. Overall therefore, whilst some flats may currently enjoy levels of sunlight below the recommended standards, the occupants of these flats will still have access to a well sunlit space near the vicinity of their home and their flats will enjoy very good levels of daylight. The proposed sun on ground assessment in the demonstrate that 94% of the podium will experience two hours of sunlight on the 21 March (Spring Equinox) which is considered a suitable date for the assessment.

NOISE AND VIBRATION

- 14.1.30. There are a number of policy requirements targeted at the management of noise levels which have been taken into account when designing the scheme including Paragraph 170 of the NPPF, the Noise Statement for England (NPSE), Intend to Publish London Plan Policies D12 and D13, as well as Local Plan Policy EQ5 which seek to ensure potential adverse impacts of noise and vibration of new development are appropriately mitigated.
- 14.1.31. In response to the policy and requirement to be dealt with as part of the ES, a Noise and Vibration Assessment (Chapter 11 of ES) has been undertaken quantified through baseline surveys. A computer model has been created, calibrated against noise survey data, to assess noise impacting on the development and nearest noise sensitive uses. Various scenarios have been carried out, including calculations with or without the Tesco, Osterley development operating at the same time, to give a worst-case scenario in line with LB Hounslow guidance.
- 14.1.32. The local environment is dominated from noise by road traffic noise on both Great West Road and Syon Lane with aircraft overflights associated with Heathrow Airport being regularly audible. There are occasional train movements on the line immediately to the south-east of the site. As the Noise Impact and Vibration chapter reports, the nearest noise sensitive receptors are at Cherry Crescent, located approximately 35m to the south-east of the Site boundary, and at Syon Lane, located approximately 40m to the south-west of the Site boundary.
- 14.1.33. In summary, construction noise and vibration have been assessed and the effects of vibration are considered to be minor adverse. Construction noise has a potentially major adverse effect both at the existing residential receptors and at the occupied phases of the development as later phases are constructed, however the mitigation measures to be adopted are considered to reduce these to be a temporary moderate adverse effect on residents at Syon Lane and Cherry Crescent / Brambles Close during the main build.
- 14.1.34. Noise egress from the site during operation has also been assessed and the development will have a negligible effect on existing and proposed sensitive receptors, this includes noise emissions from operational traffic.
- 14.1.35. The façade and ventilation design of the proposed building will ensure that the internal ambient noise levels required by BS8233:2014 are met to provide appropriate acoustic conditions for residential amenity within the development itself during the day and night-time periods.
- 14.1.36. As set out in the overheating report appended to the Energy Statement, there is a need for openable windows to meet the acceptable thermal comfort criteria. For the purposes of the noise report, it is assumed that units will utilise openable windows as the primary means of ventilation, with a background mechanical ventilation system assisting in the overheating risk mitigation.
- 14.1.37. With windows open, internal noise levels are likely to rise above the recommended acceptable levels during both daytime and night-time periods. The assumption has therefore been made that windows will be kept open when the rooms are not occupied to limit the occupant exposure to noise nuisance in conjunction with additional passive measures as described in Section 5. Windows open during unoccupied times, as well living room windows open at night will allow bedroom windows to remain closed when occupants are sleeping so disturbances are avoided.
- 14.1.38. The report demonstrates that the existing noise climate at the proposed development is such that acceptable internal ambient noise levels can be achieved with passive features including

specification of facades and glazing as well as the ventilation strategy to mitigate impacts of the traffic from Great West Road and aircraft noise overhead.

- 14.1.39. The Noise Assessment also assesses noise from fixed plant and servicing areas, as well as internal noise transfer from ground floor retail use. The report makes recommendations for noise emission limits for building services plant in accordance with the requirements of LBH. This ensures a negligible impact arising from building services plant during operation.
- 14.1.40. The proposed opening hours for the Tesco store will be as per the existing Tesco, Osterley operation. This is 07.00 – 22.00 Monday to Saturday and 10.00 – 16.00 Sunday and Bank Holidays.
- 14.1.41. All residential units within the development are separated from the Tesco Extra supermarket operation by acoustic buffer zones, including circulation, cycle stores and back of house areas. The separating floor between the car park and Level 4 residential units will be designed such that the noise limits set within BS8233:2014 and as required by LBH will not be exceeded within residential areas.

AGENT OF CHANGE PRINCIPLE

- 14.1.42. The agent of change principle is historically referred to in cases of noise disturbance, with the NPPF now including a paragraph referring to the requirement on new development to ensure that unreasonable restrictions are not placed on existing businesses and community facilities (Paragraph 182).
- 14.1.43. This is brought forward in the Intend to Publish London Plan Policy D12 where the agent of change principle applies which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. The emerging Great West Corridor Local Plan Review also includes the requirement to consider the agent of change principle.
- 14.1.44. It is acknowledged that the land to the east will come forward as employment land and the adjoining Skoda Garage site has a draft Local Plan Site Allocation for LSIS. Therefore, consideration has been given to the proposed development alongside the operation of this existing use.
- 14.1.45. The car garage and operational noise sources are located away from the car dealership and subsequently the residential blocks, nevertheless the scheme designs in appropriate mitigation for this by setting back the noise sensitive residential uses back from the boundary and by further separating it with the clean air route. It is therefore considered that no unreasonable restrictions will be placed on the adjacent site.
- 14.1.46. Overall, it has been demonstrated that the proposals are acceptable in terms of noise and vibration should not be considered a barrier to development. This is in line with Paragraph 170 of the NPPF, the NSE, Intend to Publish London Plan Policies D12 and D13 as well as Local Plan Policy EQ5.

AIR QUALITY

- 14.1.47. There are a number of policy requirements targeted at the management of air quality including the Intend to Publish London Plan Policy SI1 [3], adopted Policy EQ4, Policy GWC3 the Council's Air Quality SPG which sets out measures to minimise air pollution.
- 14.1.48. As set out above, the site is located along the GWC, a busy road network leading into central London and Heathrow. The site falls within an Air Quality Management Area and so it is necessary to consider exposure of future site users to poor air quality. Local emissions from Great West Road

paired with elevated background pollutant concentrations seen across London mean that baseline air quality conditions around the site are poor.

- 14.1.49. An Air Quality Assessment has been submitted as part of a chapter in the ES (Chapter 11) to identify negative impacts and how these can be effectively mitigated to ensure that the proposed development is compliant with policy.
- 14.1.50. The assessment considers the air quality impacts of the construction and the operation of the development at nearby existing receptors, inclusive of impacts of committed development (including the Tesco, Osterley Scheme). It also assesses the future site users and residents to poor air quality at proposed receptor locations for the same scenario.
- 14.1.51. The construction assessment has been carried out qualitatively and considers the potential impacts of construction and demolition activities, including dust nuisance and elevated particulate concentrations as a result of construction dust. Construction traffic emissions were assessed quantitatively using air quality modelling software.
- 14.1.52. The potential impacts from the operation of the development will be as a result of vehicle emissions from traffic generated by the development and emissions from the use of proposed combustion plant serving the Development. The operational impacts have been assessed, using air quality modelling software, at existing and proposed new receptor locations.
- 14.1.53. Due to the size of the Development and proximity to local residential units, during the construction phase there is the potential for temporary major adverse impacts. Best practice mitigation measures for controlling dust and emissions during construction have been recommended; ensuring these measures are in place throughout construction will lead to a negligible (insignificant) residual effect during the construction phase.
- 14.1.54. During the construction phase there will be a minor increase in heavy duty vehicles on the local road network but the overall decrease in traffic will offset any potential air quality impacts from emissions from these vehicles.
- 14.1.55. Mitigation measures proposed during the construction phase are recommended as set out in detail within the Air Quality ES Chapter. These have been informed by industry best practice and relevant guidance. The mitigation measures will be implemented and adhered to throughout the demolition and construction phases of the development to ensure the residual effects from the development will be insignificant.
- 14.1.56. As the Air Quality Assessment raises, residential properties will be located from Level 02 upwards, with the majority of residential units located from Level 04 upwards. Locating residential units at such height will increase the distance between source and receptor, and therefore pollutant levels at the proposed residential locations will be reduced compared to if they were at ground level.
- 14.1.57. In terms of the operational phase, the development is expected to lead to a net reduction of traffic on the local road network; this is due to the change of use and limited parking provision proposed. In the most realistic operational scenario where the Tesco, Osterley scheme comes forward, traffic flows, and in turn traffic emissions will decrease in proximity to the site which will lead to a marginal improvement in air quality with the Development in place. No significant impacts are predicted at existing receptor locations as a result of the construction traffic or operation of the development.
- 14.1.58. As concentrations are predicted to be below the relevant air quality objective at all proposed residential receptors, it is Buro Happold's view that balconies would be acceptable from an air

quality perspective and no further mitigation will be required at currently proposed residential receptor locations.

- 14.1.59. The heating and hot water requirements of the development will be met predominantly by heat pumps, an emission free alternative to combustion plant equipment, with three low emissions boilers proposed as top-up which can be used when required. The emissions from the three boilers are not significant at existing or proposed receptor locations.
- 14.1.60. It concludes that all residential units meet long and short-term air quality limits in the most realistic operational scenario (with Tesco Osterley). It has been demonstrated in the Air Quality Assessment submitted that during the operational phase National Air Quality objectives will be met at all proposed residential locations across the development.

WIND MICROCLIMATE

- 14.1.61. Policy 7.7 of the adopted London Plan states that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation and telecommunication interference.
- 14.1.62. Policy D7 of the Intend to Publish London Plan furthers this by stating that consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm. Policy D8 states that wind around buildings should be carefully considered and not compromise conform and enjoyment of open spaces as well as stating measures should be identified to mitigate cumulative impacts.
- 14.1.63. Policy CC3 of the adopted Local Plan states that the Council will expect tall buildings to provide a comfortable and pleasant microclimate which minimises wind vortices.
- 14.1.64. As part of the Environmental Statement (Chapter 13), wind analysis has been undertaken by RWDI to assess the likely significant effects of the proposed development on the environment with respect to wind microclimate. Buildings and terrain affect the speed and direction of wind flows and the anticipated likely wind conditions resulting from the proposed development is an important consideration in the context of pedestrian comforts and the safe use of the public realm.
- 14.1.65. The meteorological data for the site indicates prevailing winds from the south-west quadrant throughout the year with secondary winds from the north-east direction which are more prevalent during the spring months.
- 14.1.66. In the existing context during the windiest season, wind conditions on thoroughfares within and around the site range from suitable for sitting to strolling use. Wind conditions at surrounding entrance locations, bus stops and railway stations have conditions suitable for sitting to standing use. Generally, wind conditions are one category calmer during the summer season and therefore range from suitable for sitting to standing use. There are no instances of strong winds at the existing site.
- 14.1.67. In summary, during the construction phase (with the hoarding in place) conditions would be suitable for a working construction site, however, off-site thoroughfares (without hoarding) to the north and south of the development would be gradually windier than suitable for the intended use and would therefore require wind mitigation measures. Planting of evergreen trees 5.5m to 6.5m high in addition to the proposed landscaping and solid balustrade, screens and trees situated on the northern edge of the podium will be implemented and as a result the residual construction effect will be negligible to minor adverse at podium level.

- 14.1.68. In order to mitigate the wind risk, wind mitigation measures have been developed including the addition of balustrades to most of terraces and canopies to the roof terrace of Building A, four trees at the podium level between Buildings A and B with a balustrade added to the northern edge along with four vertical screens with coniferous trees between them. A solid canopy wrapped around the Tesco superstore entrance with corpse of evergreen trees clustered to the north-western corner of the Site and the inclusion of a solid screen to the trolley stand. Most windy entrances would install a draught lobby to provide interior to exterior transition, which would improve wind conditions and achieve a wind microclimate suitable for the intended use.
- 14.1.69. With these mitigation measures in place, wind conditions at entrances, crossings and car parks would range from suitable for sitting to walking use during the windiest season. During the summer season, the majority of amenity spaces would be suitable for the intended use. The exception to this would be several seating locations on the podium and balconies on B2, which would require mitigation in the form of soft or hard landscaping elements situated at two sides to provide localised shelter.
- 14.1.70. With the wind mitigation measures in place, wind conditions to the north-west of the development and on Great West Road would be similar than in the context of existing surrounding buildings particularly around entrance locations during the windiest season. No strong wind exceedances would occur with the proposed landscaping and mitigation measures in place and it would be safe for the intended use. Therefore, the residual operational effect will be negligible.

LIGHTING

- 14.1.71. Policy EQ6 of the adopted Local Plan states that the Council's approach is to reduce the light pollution impacts of development and promote reduced light pollution and sky glow across the borough.
- 14.1.72. The site is located in an existing urbanised area that lies within Environmental Zone E3 (or a medium district brightness area) as defined by the Institute of Light Professionals. The proposed development is not anticipated to produce significant lighting impacts due to the nature of the proposed residential development. The Tesco store will be sensitively lit to assist with wayfinding but will not cause any harm to amenity due to its location on the corner of the Great West Road.
- 14.1.73. The external lighting scheme is shown on the landscaping drawing included in the Design and Access Statement and we can confirm that a lighting strategy assessing the impact of the lighting proposed will be submitted by way of condition should the development be approved.



15

RESIDENTIAL QUALITY



15 RESIDENTIAL QUALITY

- 15.1.1. This section explains the high-quality nature of the residential units proposed and considers space standards, accessible homes, proportion of dual aspect dwellings, shared circulation spaces, private and communal amenity spaces.
- 15.1.2. Further details are supplied within the Design and Access Statement submitted alongside the application.

POLICY CONTEXT

- 15.1.3. Paragraph 127 of the NPPF seeks to ensure that new developments create places that are safe, inclusive and accessible which promote health and well-being. Intend to Publish London Plan Policy D4 promotes quality in new housing provision with further standards and guidance set out in the Mayor's Housing SPG.
- 15.1.4. In accordance with this strategic priority, it is essential residential quality is embraced fully, and baseline standards exceeded wherever possible, especially for high density residential development of this nature.
- 15.1.5. Policy 3.5 of the adopted London Plan relates to the quality and design of housing developments stating that they should be of the highest quality internally, externally and in relation to their context and to the wider environment.
- 15.1.6. In terms of overarching residential quality local policies, adopted Policy SC4 expects development proposals to meet the design standards set out in Building Regulations, Local Plan and associated SPD's. This includes demonstrating compliance with prevailing daylighting standards (BRE Guidance 2011) and habitable room window separation guidance.
- 15.1.7. Adopted Local Plan SC5 follows this up with ensuring suitable internal and external space is proposed, complying with the Nationally Described Space Standard.
- 15.1.8. Each sub-section below provides greater detail on the relevant policies.

SPACE STANDARDS

- 15.1.9. The proposals will meet the minimum internal space standards as set out in the Intend to Publish London Plan and adopted Hounslow Local Plan. Further, all the room sizes are designed to meet the requirements of the Nationally Described Space Standards and Housing SPG.
- 15.1.10. The internal residential layouts have ensured that the potential width and outlook of internal living rooms has been fully optimised. A schedule is included within the Design and Access Statement showing how the units comply with the Standards.

ACCESSIBLE HOMES

- 15.1.11. Policy 3.5 of the adopted London Plan states that all new housing developments should take particular account of the needs of disabled people.
- 15.1.12. As set out in Policy D5 of the Intend to Publish London Plan, all of the new self-contained homes should meet the Building Regulations M4 (2) standard for accessible and adaptable dwellings, with at least 10% of homes designed to meet the M4 (3) standard for wheelchair user dwellings. The latter should be generally distributed across tenure types, flat sizes and floors to give disabled and

older people similar choices to non-disabled people. New public realm should also achieve the highest standards of inclusive design.

- 15.1.13. All of the new dwellings will be accessible and adaptable dwellings with 10% of the homes designed to be M4 (3) wheelchair user dwellings and the remainder designed to be accessible and adaptable dwellings M4 (2) to comply with London Plan and local plan policies. The new public realm and communal amenity space will be inclusive to all.

DUAL ASPECT DWELLINGS

- 15.1.14. The Intend to Publish London Plan Policy D4 states that housing development should maximise the provision of dual aspect dwelling and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 15.1.15. Dual aspect dwellings with opening windows on at least two sides have many inherent benefits. These include better daylight, a greater chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating, mitigating pollution, a choice of views, access to a quiet side of the building, greater flexibility in the use of rooms, and more potential for future adaptability by altering the use of rooms.
- 15.1.16. Single aspect dwellings are more difficult to ventilate naturally and are more likely to overheat and should normally be avoided. Single aspect dwellings that are north facing, contain three or more bedrooms or are exposed to noise levels above which significant adverse effects on health and quality of life occur should not be permitted. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy and daylight, and that the orientation enhances amenity, including views. It must also demonstrate how they will avoid overheating without reliance on energy intensive mechanical cooling systems.
- 15.1.17. Standard 29 of the Housing SPG states that good single aspect one and two bedroom homes are possible where limited numbers of rooms are required, the frontages generous, the plan is shallow, the orientation and or outlook is favourable, and care is taken to mitigate the potential for overheating without the need for mechanical cooling.
- 15.1.18. Further, Standard 29 of the Housing SPG goes onto state that north facing single aspect dwellings should be avoided wherever possible. However, in applying this standard consideration should also be given to other planning and design objectives of a site.
- 15.1.19. In order to maximise the amount of dual aspect and semi dual aspect dwellings on site, buildings have been designed from the inside out and there has been a careful arrangement of living spaces. The scheme delivers 65% of dual and semi-dual aspect homes.
- 15.1.20. In order to improve the aspect of many homes and benefit from the dual aspect characteristics, a proportion of the homes within the scheme incorporate recesses or projections to create a second facade, which within the documentation are referred as 'semi-dual aspect'. These meet GLA's guidance by:
- ¡ Creating a length of secondary facade which is big enough to accommodate a window;
 - ¡ Using this wall to provide a full height door access to a balcony to provide cross ventilation;
 - ¡ Allowing oblique views from the living space; and
 - ¡ Providing a minimum of one aspect to the living room orientated west, south or east.

15.1.21. In addition, the semi-dual aspect typology benefits from:

- ┆ Increased privacy to bedroom from recessed balcony;
- ┆ Better sense of enclosure/privacy to recessed balcony from adjoining apartments;
- ┆ Improved living room sunlight as window is located to the face of the building, unshaded by a balcony;
- ┆ Secondary outlook from living room;
- ┆ Improved sunlight from secondary façade; and
- ┆ Cross-ventilation in living room through two openings located in different walls.

15.1.22. Although it is noted that there is a proportion of single aspect units, it should be noted that the units are of a high-quality nature and measures have been taken to ensure the living conditions within those units is not compromised. The glazing in these units have been maximised to improve daylight and sunlight levels and internal layouts and depths have been carefully considered to ensure living spaces enjoy good levels of daylight, as well as enjoying good outlook towards the podium gardens and views towards Syon Park. Furthermore, most of the single aspect homes enjoy good outlook from their windows to the podium gardens.

15.1.23. Efforts have been made to minimise the number of two and three-bedroom single aspect homes and to ensure there are no north facing single aspect homes, only a handful of north-west facing single aspect homes.

15.1.24. Point 2 have provided evidence that the BRE sunlight levels in the north-west facing units are acceptable. Those single aspect flats on the northern elevations do experience lower levels of sunlight due to their orientation but they should still enjoy some sunlight in the mornings or later afternoon. Furthermore, although some flats may currently enjoy levels of sunlight below the recommended standards, the occupants of these flats will still have access to a well sunlit space very near the vicinity of their home in the podium gardens which receive very good levels of sunlight throughout the year.

15.1.25. It is important to note that if the number of north-facing flats was reduced, it is likely that more massing would have to go on the southern boundaries of the site. This would have a much larger effect upon the neighbouring properties opposite as well as affect the views of the listed Gillette Building, and also potentially significantly reduce the level of sunlight enjoyed to the podium gardens. More than 90% of the gardens enjoy more than two hours of sunlight on the 21st March, therefore exceeding BRE Guidelines. Therefore, it is considered the current massing arrangement is a good solution to balancing the different elements and to achieve a development which protects the amenities of both the surrounding residents and future inhabitants.

SHARED CIRCULATION

15.1.26. Standard 12 of the Housing SPG states that each residential core should be accessed to generally no more than eight units on each floor.

15.1.27. On average, there are eight homes per core in all blocks except for Blocks D&E where there are slightly more. However, it is noted this is guidance and the use of the term 'generally' suggests some flexibility can be applied. Having over eight homes in a few cores is made up by the fact some cores in the upper floors have less than eight, so on average there are eight homes per core across the scheme.

15.1.28. The corridors widths will be maximised, they will be well lit, and benefit from ventilation systems to ensure thermal cooling. There will be ample space in front of stairs and lifts larger than the minimum standards and the cores will comply with fire and safety standards. Furthermore, the travelling distances to facilities such as waste storage will be minimised.

PRIVATE AMENITY SPACE

15.1.29. Adopted Hounslow Local Policy SC5 states that 5sqm of private outdoor space should be provided for each one to two-person dwelling and an extra 1sqm per each additional occupant of that dwelling. For larger units, up to three habitable rooms, 25sqm should be provided and this increases to 30sqm for units with four habitable rooms.

15.1.30. All residential development will comply with the Intend to Publish London Plan Policy D4 and Hounslow adopted Policy SC5 by providing the required amount of private outdoor space per dwelling, either through the form of a private garden or balcony. There are two units per floor in Building A which have enlarged internalised amenity space instead of their own private balcony, however, these units have access to a large roof terrace at every other level of the building.

RESIDENTIAL PLAY SPACE

15.1.31. Policy 3.6 of the adopted London Plan states that development proposals that include housing should make provision for play and informal recreation. In line with the guidance, play space provision has been calculated in accordance with the GLA’s Shaping Neighbourhoods: Play and Informal Recreation SPG.

15.1.32. Children’s play space requirements were calculated using the benchmark outlined in the GLA’s Shaping Neighbourhoods: Play and Informal Recreation SPG at 10sqm per child, and the estimated child population yield of the Development using the GLA Population Yield Calculator (Version 3.2).

15.1.33. The Development, once fully operational, is estimated to generate a total of 237 children between the ages of 0 and 17, as set out in the Table below. Among this population, 110 children would be aged under 5, 80 would be of primary school-age (5-11) and 47 would be of secondary school-age (12+).

15.1.34. Based on the anticipated child yield from the Development, a total of 2,370 sqm of play space would need to be delivered to meet the GLA’s requirements.

Table 15-1: Child Yield and Play Space Requirement

Age Group	Child Yield	Play Space requirement
Under 5s (ages 0 – 4)	109.6	1,096
5 – 11	80	800
12+ (up to 17)	47.4	474
Total	237	2,370

Existing play space provision

15.1.35. Within the local area there are a number of existing facilities which will help to meet this requirement. The GLA's Play and Informal Recreational SPG provides the following benchmark standards in determining accessibility of play space for different age groups. These are set out in Table 15-2.

Table 15-2: Accessibility to play space standards

Age Group	Maximum walking distance
Under 5's	100m
5 - 11	400m
12+	800m

15.1.36. WSP has undertaken a play space audit to help identify the play space facilities at these respective radiuses.

Under 5s (100m radius)

15.1.37. There are no play space facilities within 100m of the site. The requirement for under 5s play space should therefore be provided on site.

5 – 11 (400m radius)

15.1.38. There are no play space facilities within 400m of the Site. The requirement for 5 – 11s play space should therefore be provided on site.

12 + (800m radius)

15.1.39. The open space audit identified four open space sites within 800m of the Site. Table 15-3 provides information on these sites and the facilities on offer. Figure 15-1 below illustrates their respective locations

Figure 15-1: Information on sites and facilities on offer

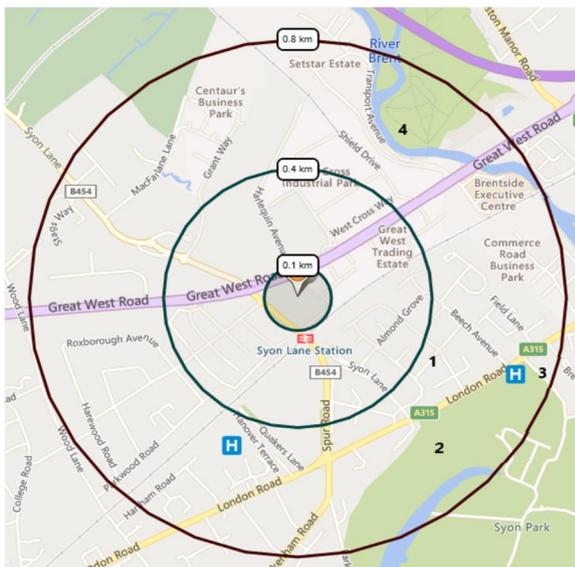


Table 15-3: Play Space within 800m radius of Site

Play space facility	Location on map	Distance from site	Facilities	Playable space typology
Hawthorn Road Park	1	476m south east of the site	Under 5's children's playground	Doorstep playable area
Syon Park	2	650m south of the site	Over one hundred acres of parkland.	-
Brent Lea Recreation Ground	3	764m south east of the site (sits adjacent to Syon Park)	Multi-use games area.	Youth space
Boston Manor Park	4	600m north east of the site	Children's play area, tennis courts, basketball courts, football posts.	Neighbourhood playable space/youth space

15.1.40. The proposed development incorporates 1,096 sqm of child play space for the age categories 0-5 and 800 sqm for ages 5-11. The proposed development provides the required play space for these age categories, the site will be providing pockets of high-quality play space primarily for the age groups 0-5 years to encourage opportunities for outdoor play, this will include a mix of lawns and natural play features.

15.1.41. It is considered that the over 12s can access existing facilities within the four open spaces within 800m of the site. There are also a number of play and sports facilities such as Osterley Sports and Athletic Centre, the Old Isleworthians Sports Club, Hawthorn Road Park and Brent Lea Recreation Ground close to the site. The GLA confirmed in their pre-application response that the approach was supported.

COMMUNAL AMENITY SPACE

15.1.42. The Housing SPG sets out various standards for developing private and communal amenity space. Standard 3 seeks to ensure that development proposals comply with local open space strategies. Standard 4 states that proposals should demonstrate that the space:

- i Is overlooked by the surrounding development;
- i Is accessible for disabled people including people who require level access and wheelchair users; and
- i Is designed to take advantage of direct sunlight; and has suitable management arrangements in place.

15.1.43. Policy SC5 of the Hounslow Local Plan sets benchmark external space standards. It states that communal external space should be provided no less than the following standards.

- i For each flat:
 - Up to three habitable rooms – 25sqm
 - Four habitable rooms – 30sqm

- Five habitable rooms – 40sqm

- 15.1.44. The policy goes on to state that the private outdoor space for one or two-bedroom flats can be deducted from the overall provision for communal external space.
- 15.1.45. The proposed development would deliver 4,928sqm of multifunctional communal amenity space in the form of podium gardens and 2,716sqm of public accessible streetscape.
- 15.1.46. Although this is a lower provision than should be provided on site in terms of the calculation set out in the policy which we calculate to be 9,244sqm, it is important to note that Hounslow Policy SC5 (relating to external space standards) is borough wide and provides a benchmark standard which suggests some flexibility can be applied.
- 15.1.47. The proposals are for a flatted development located near to Brentford Town Centre. The proposed podium gardens would be centrally located within the development and accessible to all residents. It is also important to note that the site benefits from having a number of open spaces and parks in close proximity within the surrounding area including Syon Park, which is a five-minute walk, Boston Manor Park, which is a ten-minute walk, and Osterley Park, which is a ten to 15 minute walk.
- 15.1.48. The Podium Level Landscape Masterplan included in the submitted Landscape Strategy highlights the featured community-nature garden areas, community facility terrace, grass seated steps and mounding and natural play elements. The strategy incorporates three social hub areas proposed fronting a nature garden and wildflower meadow, landscaped gardens and the podium lobby plaza and garden.
- 15.1.49. The Podium Lobby Plaza and garden are envisioned act as an arrival, meeting and orientation space just above the principle residential access from Syon Lane. A carefully designed footpath network has been weaved into the podium level landscaping scheme to ensure all the residential cores are linked with the various podium level destinations on offer.
- 15.1.50. The community garden, seating and play elements all contribute to St Edward's aim of creating a high-quality accessible place to improve mental and physical health and wellbeing, to increase social interaction by providing opportunities to meet and socialise and promote play and physical activity as part of the new residential-led mixed-use development. As a matter of principle, the public realm will be wheelchair friendly, including the residential courtyards, and will be suitable for those visually impaired.
- 15.1.51. Key components of the podium gardens include:
- ¡ A Podium Lobby plaza and garden provided as an arrival, meeting and orientation space above the principal residential access from Syon Lane;
 - ¡ An efficient footpath network linking the Podium Lobby directly to all residential cores and destinations within the gardens;
 - ¡ Social hubs comprising seating areas and terraces located to take advantage of favourable aspect and outlook will provide places for residents to meet and socialise;
 - ¡ Extensive richly layered planting in raised planters throughout the gardens, including multi-stem trees and shrub planting, will provide an attractive green environment. Plant species will be selected for seasonal year-round interest and for benefits to wildlife;
 - ¡ The garden located between Block D&E will be designed to promote and generate an interest in biodiversity, nature and produce;

- i Plant species selected for value to wildlife, meadow lawn areas and integrated ecological features (e.g. 'Bug Hotels') will provide opportunity for residents to engage with nature on their doorstep;
- i Mounded and terraced lawns will provide a variety of open spaces for relaxation and play;
- i Each home at podium level will have an individual private terrace encouraging outdoor living; and;
- i Raised planters with boundary hedge planting will provide separation and privacy from the communal garden areas. Individual private terraces will be separated with privacy screens.

15.1.52. The podium gardens will be a high-quality space which is enclosed and orientated to provide protection from the elements including noise, air pollution and wind, whilst benefitting from good daylight and sunlight levels making it an excellent living environment for the proposed residents.

15.1.53. The proposed design and quality of the communal amenity spaces will help reinforce the sense of place and help generate a cohesive community. It will be overlooked by the surrounding development and will be accessible and designed to take advantage of direct sunlight. This is in keeping with the principles of the Intend to Publish London Plan, Hounslow Local Plan and Housing SPG.

REFUSE AND RECYCLING

15.1.54. From the outset consideration has been given to the design standards in the Intend to Publish London Plan, Housing SPG and adopted Hounslow Local Plan.

15.1.55. Standard 22 of the Housing SPG state that communal refuse and recycling containers should be easily accessible to all residents. Standard 23 goes on to state that the bin facilities should be provided in accordance with local authority requirements and British Standards.

15.1.56. Based on the proposed uses expected to comprise the Proposed Development is anticipated that once operational approximately 102, 662 L of waste from both residential and commercial uses will be generated per week. Of this, 96,458 L will arise from residential uses, and 6,202 L will arise from commercial uses.

15.1.57. Refuse and recycling facilities have been incorporated into the design of the building in line with relevant standards.

15.1.58. Waste and recycle arising from the Tesco foodstore and community areas will be managed independently from the residential and commercial elements of the proposed development. The refuse stores for Tesco will be provided within the back of house area and will be managed by the store.

15.1.59. It is expected that the waste and recycle stream breakdown for the relocated Tesco foodstore and community floorspace will be as follows: Recycling (card, plastic, oil and metal): 69 %, Food waste: 10%, Residual waste, 18% and Surplus materials: 3%.

15.1.60. All waste and recycalate materials arising from the Tesco foodstore and community area will be collected independently, separate from the residential and commercial areas of the proposed development.

15.1.61. The refuse and recycling management strategy for the commercial tenants states that daily (or as agreed), the commercial tenants will collect waste/recyclable material from the proposed development's commercial units (excluding Tesco), and dispose of this material into separate bins

dependant on the material stream. The commercial bin store will be free of any residential waste/recyclable material as to comply with relevant requirements. At this stage, it is envisioned that a private waste contractor will be commissioned to undertake the collections from the proposed development's commercial areas (excluding Tesco foodstore).

- 15.1.62. For the residential element of the scheme, the localised refuse store is located for each core, with easy access from residential units via internal lift (per core). In terms of managing the residential refuse collection, the building management will transport full bins via a goods lift to the area designated on the lower ground floor within 10m of the collection point. Whilst it is noted collections are currently weekly, collections by LBH will shortly be on a fortnightly basis.
- 15.1.63. Table 9 of the submitted Waste Strategy sets out the residential storage requirements within the main bin store on a weekly collection frequency for a variety of recycled and residual materials. In total, the following residential bin storage capacity is proposed:

- i 71 x 1,100L
- i 34 x 360L
- i 30 x 240L

- 15.1.64. In terms of bulky waste, the internal management team will collect bulky waste from individual residential units. Here, they will transfer the waste to the bulky waste store via refuse lifts. The internal management team will also ensure that bulky waste is frequently cleared.
- 15.1.65. The Operational Waste and Recycling Management Strategy submitted as part of this application provides further details of the waste management strategy for each of the proposed uses and occupiers.

FIRE STRATEGY

- 15.1.66. Policy D12 of the Intend to Publish London Plan requires all major development proposals should be submitted with a Fire Statement. A RIBA Stage 2 Fire Strategy has been prepared by International Fire Consultants Ltd, which demonstrates a level of fire safety equal to or greater than the general standard implied by compliance with the relevant Building Regulations for the current stage of design. Following approval of planning permission, a formal Fire Strategy will be prepared for approval through the Building Regulations process.
- 15.1.67. The proposals for the Homebase site have been developed to achieve the highest standards of fire safety in line with Policy D12 of the Intend to Publish London Plan. The following will be achieved as part of the proposed development:
- i In order to apply the recommendations, set out in BS 9991 for single stair (residential) buildings, sufficient fire separation will be provided between all blocks/adjacent areas;
 - i Automatic fire detection and alarm (landlord system, apartments, common residential corridors, fire brigade evacuation alert system, Tesco store);
 - i Given the building height exceeding 30m in height, sprinklers will be provided throughout all parts of the development;
 - i Given a single part of the development exceeds 50m in height, it has been proposed to provide a wet fire main. All of the fire mains within the development will be fed by the wet main;
 - i All parts of the site will be served by fire-fighting shafts. Firefighting stairs will meet the relevant criteria of BS9991;



- i Smoke ventilation will be provided in residential corridors, fire-fighting shafts, car parks (natural ventilation by permanent openings and where not possible, through mechanical ventilation) and the basement; and
- i The fire service will have access to the entire perimeter of the development and so can achieve parking locations within 18m of each building entrance point.

15.1.68. Overall, the Fire Strategy indicates that the relevant considerations have been designed to accord with relevant Building Regulations and the Intend to Publish London Plan.

16

SOCIO-ECONOMIC, RETAIL AND COMMUNITY



16 SOCIO-ECONOMIC, RETAIL AND COMMUNITY

POPULATION AND HUMAN HEALTH

- 16.1.1. Policy GG3 of the Intend to Publish London Plan states that the potential impacts of development proposals on the mental and physical health and wellbeing of communities in order to mitigate any potential negative impacts and to maximise potential positive impacts.
- 16.1.2. The Environmental Statement and Health Impact Assessment considers the wider human health considerations as well as the potential positive effects and outcomes on the health of the existing and proposed population from the development.
- 16.1.3. The proposed residential and retail focused development will have an effect on population numbers as this is highly likely to increase in the long term. Potential effects on human health from the proposed development include noise, air quality and transport. These considerations have been considered elsewhere in the Planning Statement.
- 16.1.4. A Health Impact has been prepared in support of the application which assesses the potential health effects of the proposed development and provides recommendations to seek to maximise health gains and remove or mitigate potential adverse impacts on health.
- 16.1.5. The Assessment found that the development would have a positive health effect in relation to 11 out of 11 of the key health themes set out below:
- ┆ Housing quality and affordability;
 - ┆ Access to healthcare services and other social infrastructure;
 - ┆ Access to open space and nature;
 - ┆ Air quality, noise and neighboured amenity;
 - ┆ Accessibility and active travel;
 - ┆ Crime reduction and community safety;
 - ┆ Access to healthy food;
 - ┆ Access to work and training;
 - ┆ Social cohesion and lifetime neighbourhoods;
 - ┆ Minimising the use of resources; and
 - ┆ Climate change.
- 16.1.6. The design of the development in terms of its high quality and healthy environment for future uses, building upon local green infrastructure to provide biodiversity and recreation enhancements where possible.

BENEFITS FOR THE LOCAL ECONOMY

- 16.1.7. The proposed development will have a wide range of benefits for the local economy. There will be significant economic benefits, including increase in expenditure locally from new residents and the provision of employment generating retail uses.
- 16.1.8. The delivery of the schemes is interdependent due to the movement of the Tesco store from its existing premises to the Homebase Brentford site. Trading of the new store will not begin until trading ceases on the existing store. Taking account of the strong link between the retail provision of the site, employment levels and the assessment of retail impact has been undertaken at the strategic opportunity level.

- 16.1.9. There are currently 35 existing FTE employees at the Homebase store and 290 existing FTE jobs at the Tesco, Osterley store. It is intended that staff employed at the existing 290 jobs at the Tesco store would be transferred to the replacement store and as a result, no existing Tesco jobs would be lost.
- 16.1.10. When considering the provision across the two sites as a strategic opportunity, the two sites will support up to 15,948 sqm of non-residential floorspace, the majority of which would be retail which could support over 600 jobs, and over 300 would be new positions.
- 16.1.11. Chapter 6 of the submitted ES relating to Population and Human Health uses the Labour Forecasting Tool to estimate the number of construction jobs to be created during the construction phase. The LFT calculations assume a three-year construction programme commencing in 2023 and finishing in 2026. It is anticipated that the proposed development will result in an average of 491 full time equivalent (FTE) workers per month from ground workers to construction management. It is calculated that there will be a further 476 indirect jobs created during the construction phase.
- 16.1.12. Accordingly, this is compliant with adopted Local Plan Policies ED1 and ED2, which seek to promote local employment and economic development and resist the loss of employment floorspace as well as emerging GWC Local Plan Policy GWC1, which seeks to improve the local economy by providing a more diverse retail and food offer.

RETAIL CONSIDERATIONS

- 16.1.13. The redevelopment of the Homebase site will lead to the relocation of the existing Tesco store, 11,582sqm (GIA) to 10,550sqm (GIA) in an out of centre location. This is a reduction of 1,032sqm (GIA) floorspace.
- 16.1.14. The existing Homebase store provides a total of 4,180sqm (GIA) retail floorspace. For the Homebase site, the proposed development would result in an increase of 6,370sqm (GIA) of retail floorspace (previously A1 floorspace).
- 16.1.15. There is also 137 sqm (GIA) of additional commercial, business and service space proposed along the Syon Lane frontage. Overall, across both strategic applications a maximum of 15,948sqm of non-residential floorspace will be supported and this will primarily be located at ground floor level.
- 16.1.16. Policy TC5 of the adopted Local Plan relates to isolated local shops, which means shops that are outside of designated town or neighbourhood centres. By this definition, the site is an isolated local shop. Part (i) of the policy requires that where change of use from A1 retail is proposed, the availability of alternative shopping provision is demonstrated within 400m of the site. The Tesco store is moving only 260m to the south of its existing premises to the Homebase site and, therefore this requirement is fulfilled as the community will continue to have access to the existing provision but enhanced through a new store and layout.
- 16.1.17. The amount of non-residential floorspace on the Tesco site is decreasing given the movement of the store and principle of redeveloping for residential, by 6,500sqm. As noted above, the Council has assessed this as suitable in their emerging evidence base. The main change is the shifting of retail floorspace to respond to upcoming vacancy on the Homebase site as part of the strategic opportunity. Overall, the strategic opportunity would actually involve a reduction in retail floorspace (previously A1 Use Class) of 4,208sqm in two out of centre locations. Therefore, the policy tests associated with the delivery of retail outside of designated town centres are not necessarily as relevant when looked at the proposals as a whole. However, taking into account the level of retail

and other non-residential uses on the Tesco site and the Homebase site, the relevant policy tests are set out below alongside the findings of the Retail Statement.

- 16.1.18. Adopted Local Plan Policy TC3 requires that the sequential approach is taken for proposals over 500sqm of retail or 2,500sqm of other main town centre uses is proposed
- 16.1.19. As the site is located in an out of centre location for the purposes of the NPPF Paragraph 89, Intend to Publish London Plan Policy SD7 and Local Plan Policy TC3 (H), the sequential assessment applies which directs proposals for retail floorspace and other main town centre uses (as defined in the NPPF) to the borough's four town centres.
- 16.1.20. Across the two sites overall, the proposed development would actually involve a reduction in convenience/comparison retail floorspace of 4,208sqm (GIA) and the impact test does not apply. However, for robustness, a qualitative impact assessment has been undertaken.
- 16.1.21. Accordingly, Retail and Town Centre Use Statement has been prepared by WYG, which accompanies this application. This assessment demonstrates that there are no sequentially preferable sites available in the town centre to accommodate this development or that the proposals will not lead to significant adverse impact to the nearby town centres in with the NPPF, Intend to Publish London Plan and local policies.

SEQUENTIAL ASSESSMENT

- 16.1.22. A sequential assessment has been undertaken by WYG to support the principle of development on the Homebase site.
- 16.1.23. Paragraphs 85-86 of the NPPF set out the requirements of the sequential test to be applied to planning applications which are not in an existing centre. In line with the NPPG guidance relating to town centres and retail, the approach to the sequential test carried out was both proportionate and appropriate to the proposals.
- 16.1.24. Policy SD7 of the emerging London Plan states that when considering development proposals, boroughs should take a town centres first approach and apply the sequential test to applications for main town centre uses.
- 16.1.25. The following centres were reviewed:
- ┆ Brentford Town Centre;
 - ┆ Hounslow Town Centre;
 - ┆ St Johns Road/ Isleworth Large Neighbourhood Centre; and
 - ┆ Hanwell District Centre.
- 16.1.26. Old Isleworth Large Neighbourhood Centre and Heston Large Neighbourhood Centre were not included in the assessment given these centres do not serve the same catchment as the existing or proposed Tesco store. Given the size of the proposed relocated Tesco store and the role of the smaller neighbourhood centres in the Borough, it was not considered appropriate to assess smaller neighbourhood centres.
- 16.1.27. In terms of flexibility for the assessment, WYG reviewed the sequential approach to establish whether other site opportunities are available or suitable to support the applicant's development which would require a site of at least 1.5ha. WYG stated that any site smaller than 1.5ha would not be able to meet car parking requirements/standards, adequate servicing arrangements or adequate

foodstore floorspace on a single footprint. To demonstrate flexibility, the minimum site area has been reduced further by 20% (1.2ha).

- 16.1.28. The sequential assessment undertaken demonstrates that there are no suitable or available sequentially preferable sites or units in Brentford Town Centre, Hounslow Town Centre, Hanwell District Centre, and St Johns Road Large Neighbourhood Centre which could support the proposed relocated Tesco store on the Homebase site.
- 16.1.29. The assessment concludes that there are also no suitable or available sequentially preferable sites or units in relevant centres in the Primary Catchment Area for the local retail, commercial and community provision proposed on the Tesco site.
- 16.1.30. On this basis, WYG conclude that the proposed development passes the sequential test requirements set out in Local Plan Policy TC3, Policy 4.7 of the London Plan and paragraph 86 of the NPPF.

RETAIL IMPACT

- 16.1.31. Paragraph 89 of the NPPF states that when assessing application for retail development outside town centres, which are not in accordance with an up-to-date plan, a retail impact assessment should be required if the development is over a 2,500sqm gross floorspace, if there is no locally set threshold.
- 16.1.32. Adopted Local Plan Policy TC3 requires an impact assessment where development proposals outside of the borough's four main town centres involve over 500sqm of A1 retail or 2,500sqm of other main town centre use floorspace.
- 16.1.33. It is not considered necessary or appropriate to provide a detailed quantitative impact assessment in this instance. The reasoning for this is because the proposals involve:
- ┆ A relocation of an existing foodstore to a site just 260m from its existing site (with the relocated store being smaller in size);
 - ┆ Limited local retail and community floorspace to specifically support 1,650 proposed new homes; and
 - ┆ No gross or net increase in retail floorspace.
- 16.1.34. The Retail Impact Assessment prepared by WYG sets out the context for the proposed development and provides an impact assessment and conclusions. WYG's assessment assessed the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal.
- 16.1.35. The scope and level of detail of the retail assessment has been agreed with the London Borough of Hounslow.
- 16.1.36. In agreement with Hounslow's planning officers, the assessment analyses the potential impact of the proposals on the following centres:
- ┆ Brentford Town Centre (circa 1km to east);
 - ┆ Hounslow Town Centre (circa 2.5km to the west);
 - ┆ St Johns Road (Isleworth) Large Neighbourhood Centre (circa 1.9km to the south);
 - ┆ Spur Road/London Road Small Neighbourhood Centre (circa 600 metres to the south-east); and
 - ┆ Thornbury Road Small Neighbourhood Centre (circa 1.5km to the west).

16.1.37. When considering the application against the retail/town centre use policy tests, the following are important material considerations which should be taken into account by the Council in the determination of the two applications (Homebase and Tesco):

- ┆ The proposals involve the relocation of a Tesco store to a site just 260m from its existing site;
- ┆ The proposed retail/commercial/community provision on the Tesco and Homebase sites is to primarily serve/support the proposed residential units; and
- ┆ Overall, the proposals involve no increase in retail floorspace.

16.1.38. The Retail Impact Assessment concluded that the proposal will not adversely impact any existing, committed or planned public and private investment within Brentford Town Centre, Hounslow Town Centre, St Johns Road (Isleworth) Large Neighbourhood Centre, Spur Road/London Road Small Neighbourhood Centre or Thornbury Road Small Neighbourhood Centre.

16.1.39. In terms of the impact on centre vitality and viability, the assessment concludes that all of the assessed relevant centres are considered to display reasonable to good levels of vitality and viability. It notes that the redevelopment schemes being implemented in Brentford and Hounslow town centres, once completed, will further enhance their vitality and viability.

16.1.40. Overall, the assessment concludes that the proposals will not adversely impact:

- ┆ Any existing, committed or planning public and private investment within Brentford Town Centre, Hounslow Town Centre or Hanwell District Centre; and
- ┆ The vitality and viability of St John's Road, Spur Road/ London Road, and Thornbury Road neighbourhood centres.

COMMUNITY SPACE

16.1.41. A small community space of 200 sqm (GIA) is proposed above the Tesco store which will be available for members of the community to use.

16.1.42. Tesco currently have 72 community spaces built into their Extra stores. The community space will be entirely non-profit making for Tesco and there is no charge for those who wish to use the community space. Occasionally, activities to the benefit to the local community may incur a small fee. The community space will be marketed to the local community. A full time Community Space Champion will operate and manage the space successfully.

16.1.43. Examples of users who could use this space are:

- ┆ Local church groups;
- ┆ Non-profit making organisations;
- ┆ Local fitness/yoga instructors with relevant qualifications who are willing to run reduced fee classes;
- ┆ Local education establishments such as schools and colleges who would like to use the space.

16.1.44. It is intended this space will be a valuable community asset and will comprise a modern facility with attractive views towards the Gillette Building.

17

TRANSPORT AND ACCESSIBILITY



17 TRANSPORT AND ACCESSIBILITY

- 17.1.1. This section considers the transport and accessibility components of the proposals, including an assessment of highways impact and details of proposed car parking and cycle parking, as well as providing details on the promotion of sustainable travel and servicing and delivery details.
- 17.1.2. This section should be read alongside the suite of transport reports which accompany the application including the Transport Assessment, Residential Travel Plan, Framework Workplace Travel Plan, Construction Logistics Plan, Car Park Management Plan and Delivery & Servicing Plan.

POLICY CONTEXT

- 17.1.3. Adopted Local Plan Policy EC2 relates to developing the local transport network. This seeks to secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reducing congestion, improving the public realm and improving health and well-being. This will be achieved by using standards established in the London Plan for car parking, cycle parking and electric vehicle charging.
- 17.1.4. Emerging London Plan Policy T1 states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future transport, walking and cycling routes, and ensuring that any impacts on London's transport networks and supporting infrastructure are mitigated. The Mayor's Vision Zero is that the TA should identify measures which can be used to eliminate recorded accidents and should demonstrate how the development will contribute towards the Vision Zero approach.
- 17.1.5. Emerging Local Plan Policy GW5 relates to transport and connectivity. It seeks improvements to the delivery of new transport interchange sites, improving cycle infrastructure, improving the frequency and efficiency of the bus network and encouraging walking and cycling.
- 17.1.6. Emerging Local Plan Policy GW6 seeks to connect people and places, supporting sustainable development and growth along the Great West Corridor. The Council will work with developers and stakeholders to improve public transport and infrastructure across the Great West Corridor.
- 17.1.7. The Great West Corridor Masterplan and Capacity Study proposes significant improvements to bus services along the Great West Corridor, proposing cycle improvements along the A4 and proposes to use the Healthy Streets approach to create places that are considered walkable, improving walking connections along the Corridor.

TRANSPORT AND ACCESSIBILITY

- 17.1.8. A key policy of the Intend to Publish London Plan is Policy H1 which states that to optimise potential for housing delivery on all suitable and available brownfield sites through planning decisions especially on sources of capacity such as sites which are located within 800 metres of the station.
- 17.1.9. The site has a public transport accessibility rating of PTAL 2/3. The southern part of the site falls into a PTAL 3 area, due to its proximity to bus services on London Road.
- 17.1.10. Whilst the site holds a PTAL rating of 2/3, Syon Lane station is less than 100m away. Syon Lane station is in Zone 4. National Rail services direct to London Waterloo, Richmond and Weybridge.

Furthermore, Osterley Station provides access to the Piccadilly line service and is within 2km of the site.

- 17.1.11. There are bus stops directly adjacent to the site on A4 Great West Road and Syon Lane within 50m. Bus stops on London Road, adjacent to Syon Park are also accessible to the site, approximately 600m south of the site.
- 17.1.12. The site is well served by bus routes with seven regular bus services within walking distance of the site. The H28 bus route runs along Syon Lane and stops and turns around at Tesco Osterley. The H91 can be accessed from the A4 at bus stops K/C respectively and serves destinations which include Chiswick, Hammersmith and Hounslow Town Centre.
- 17.1.13. The 235, 237, 267, E8 and N9 bus routes can be accessed from London Road, at bus stops X/W. All routes provide at least three services per hour, while the most frequent services, routes 235, 237 and E8, provide seven services per hour.
- 17.1.14. Although the PTAL rating of the site is 2/3 it is expected to increase. The changes in the area as a result of the Opportunity Area designation and support in emerging planning policy are linked with relational improvements in the accessibility of the area, with identified improvements to the public transport network expected to increase the site and surrounding area's connectivity considerably.
- 17.1.15. Improvements include better pedestrian connections along Syon Lane and around Syon Lane station, enhancements to existing cycle routes the installation of new infrastructure such as crossing, dropped kerbs and paving and a designated cycle path along Syon Lane connecting to the A4. There is also a potential for a new rail link between Brentford and Southall in Ealing.
- 17.1.16. The E1 bus service, which would stop adjacent to the Site, would provide 6 additional services per hour. The WLO rail link would provide between 4-8 services per hour, subject to further consultation. This would increase the PTAL score to 3, bordering on 4.
- 17.1.17. The existing pedestrian network in the vicinity of the site predominantly caters for movements across the northern and western frontages of the site, on Syon Lane and Great West Road respectively. Pedestrian connectivity to the southern frontage of the site is through a private access road (Syon Gate Way) whilst the eastern frontage is bound directly by the adjacent car showroom access road.
- 17.1.18. As the TA sets out, the report is accompanied by an ATZ assessment. This assessment covers the key routes in the wider area, such as routes to the nearest rail stations, bus stops, parks and amenities and will identify deficiencies that will need to be addressed by the development.
- 17.1.19. The intensification of the site for a residential led mixed-use scheme will result in more movement from the site which will be carefully planned for and management throughout the life of the development. The pedestrian environment has been designed with reference to the high pedestrian demand that occurs from Syon Lane station and to and from the Sky Campus. St Edward are keen to promote the sustainable transport options available from the site, primarily by improving the access to Syon Lane station and through the creation of clean air routes.
- 17.1.20. There are a series of existing crossings which will take people into the site from the other side of Syon Lane and the Great West Road. An underpass is located on the north end of the site to cross towards the Gillette Corner.
- 17.1.21. There are also proposed walking and cycling improvements. This will include amendments to the A4 Great West Road cycle track, Cycleway 9, and footway. The changes proposed are intended to

improve road user safety and make cycling a more appealing option for travel, in order to promote sustainable transport methods for future employees and residential occupiers.

- 17.1.22. The proposed design contributes to the creation of new clean air routes to the east and south of the site through the enhancement of Syon Gate Way, and the creation of a new pedestrian and cycle route along the eastern boundary at Syon Gate Lane and the south side of Great West Road includes a segregated cycleway and two adjoining footpath.
- 17.1.23. The proposed development is surrounded on four sides by a public pedestrian pavement. The design of the street network and presence of demarcated footpaths will ensure a legible environment for pedestrians. The footpaths along Great West Road and Syon Lane include level and DDA compliant access to ensure suitable accessibility is available to all users.
- 17.1.24. The existing subway from the north west corner of the site from Syon Lane through to Syon Lane on the other side of the Great West Road will be enhanced with a wider footpath and additional trees and vegetation leading to its entrance to improve its openness and visibility.
- 17.1.25. The proposed transport and accessibility arrangements have been informed by advice received from TfL, the GLA and the Council's Transport team and the proposals are in accordance with the Intend to Publish London Plan Policy H1 and the aims of Policy EC2 of the adopted Local Plan where the Council aims to secure more sustainable travel. The Transport Reports submitted take account of the Mayor's Transport Strategy and makes particular attention to Healthy Streets and planning for good growth, as well as Vision Zero agenda.
- 17.1.26. All in all, the proposed walking, cycling and bus improvements align with the vision of the Great West Corridor Masterplan and Capacity Study and emerging Local Plan policies GW5 and GW6 relating to improving the bus network, and finding ways to improve the realistic prospects of future users of the site, choosing to walk and cycle.

ACCESS

- 17.1.27. The site is provided with a dedicated site access from Syon Lane. The site access currently operates with a priority control (a give way junction) and two exit lanes are provided from Homebase, accommodating left and right turning movements respectively.
- 17.1.28. Pedestrian access to the Homebase site is primarily taken from the site vehicular access at Syon Lane. Additionally, a pedestrian access point is available from the northern perimeter of the site which accommodates access from the footway on the Great West Road.
- 17.1.29. Service vehicles are currently using the site's only vehicular access, sharing this access with customer traffic. Service vehicles are provided with a dedicated on-site service yard.
- 17.1.30. Syon Gate Way is a privately managed access road which routes along the southern perimeter of the site. Syon Gate Way forms a junction with Syon Lane at a point of some 90m south of the existing Homebase site access junction.
- 17.1.31. The Skoda car dealership operates immediately to the east of the site, which is served by a two-way access from the A4, Great West Road. The access road flanks the eastern perimeter of the Homebase site.
- 17.1.32. The proposed vehicular access is in the same location of the existing site access junction, from Syon Lane and will be accessed by the residential and retail car park. A two-way ramp will serve a two-storey car park. It is proposed that the junction of main vehicular access with Syon Lane will

take the form of a three-arm signalised junction. No barrier controls will be implemented in line with the GLA pre-application advice received as there was a potential risk of queuing blocking back on Syon Lane and leading to delays.

17.1.33. Servicing facilities are located at the southern perimeter of the site. Additionally, a servicing layby is proposed at the site interface with Syon Gate Way. Whilst the formation of an emergency access route is proposed at the eastern perimeter of the site.

HIGHWAYS IMPACT

17.1.34. Paragraph 108 of the NPPF states that in assessing applications for development, any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

17.1.35. In accordance with the NPPF, Intend to Publish London Plan Policy T4 and adopted Local Plan Policy EC2 and emerging Policy GWC6, a Transport Assessment has been prepared that demonstrates the acceptability of the proposal in highways and access terms.

17.1.36. Emerging policy GWC6 also requires the submission of a Transport Assessment and sets out principles of connectivity within the Great West Corridor such as reducing traffic congestion, increasing pedestrian connectivity and legibility and improve public transport services. The Transport Assessment sets out the impact of the proposed development on the highway network and other transport modes. It has been done in compliance with Transport for London's (TfL) latest guidance including Healthy Streets guidance. The assessment has taken account of other permissions coming forward in the local area, finding that, as with the proposed development, sustainable transport modes and the public realm are being prioritised. Overall, the sites are low car or car free and do not result in a material impact on the local road network.

17.1.37. The approach to modelling the impact on the highway network has been agreed with TfL and the Council at pre-application stages and is set out in the Transport Assessment. The likely impacts have been identified, taking into account planned changes in the capacity of the local road network such as the increased capacity at Gillette Corner.

17.1.38. It sets out that the implications of the development schemes on traffic movements locally is:

- ┆ Traffic associated with the existing Homebase store would be removed from the Site as a result of the Tesco store's demolition;
- ┆ Tesco traffic that currently routes to and from Syon Lane north of the A4 would be redistributed as a result of the development schemes, with future Tesco traffic gravitating to Syon Lane south of the A4 Great West Road;
- ┆ Traffic to the new Tesco store would reduce in comparison to existing, due to the constraint imposed by a reduction in car parking numbers at the new Tesco store (circa 600 existing spaces down to 400);
- ┆ Residential traffic would be generated by the development scheme that doesn't currently exist locally; and
- ┆ Some petrol filling station (PFS) traffic movements would be removed from the local highway as a result of the demolition and removal of the Tesco PFS at Tesco, Osterley.

17.1.39. The traffic model has been developed to assess the impact of the combined development projects at Homebase and the Tesco Osterley site.

17.1.40. The effect of the two developments is to remove traffic from Syon Lane and nearby roads, with a net reduction in traffic on all 11 traffic links assessed. The location of the links and net reductions in traffic are show in Table 17.4 below (Insert 10.2 from the TA). The reductions along Syon Lane to the north of the A4 would be particularly significant with c. 4,000 fewer daily vehicle movements.

Table 17.4 – Traffic Data



17.1.41. The journey time analysis reveals that the junction of Syon Lane with the Great West Road would not be adversely affected and overall there would be a positive effect on how the junction operates. There would be slight increases in journey time on some turns and decreases on others but in most cases these changes are less than 30 seconds, and in each of the AM peak, the PM peak and the Saturday peak, the reductions in journey time (up to a maximum of 139 seconds) would far outweigh the increases (up to a maximum of 82 seconds).

17.1.42. The majority of bus journey times would decrease, with journey time savings in the PM peak and on Saturday. Where there would be increases in the AM peak, these are slight and would not be noticeable.

17.1.43. In order to address the re-direction of traffic to account for the change in the location of the Tesco store, a second right turning lane would be provided on the A4 Great West Road, accommodating traffic turning right into Syon Lane, south of the A4. This alongside the provision of a new traffic signal-controlled site access to the Homebase site will address any minor impacts identified on the network.

17.1.44. Overall, the cumulative impact of the two schemes will have a consequential redistributive effects on traffic movements, however the Transport Assessment and Environmental Statement finds that planned measures addressing capacity will mitigate this and that there are no adverse traffic impacts as a result of the proposed development and its relationship with the Tesco, Osterley site. The proposed developments will aid public transport connections which complements the significant cycle and pedestrian connectivity.

17.1.45. The TA concludes that the development would not result in an unacceptable impact on highways safety and the cumulative impact would not be severe and in line with Paragraph 109 of the NPPF there should be no highways reasons why planning permission should be withheld or refused.

CAR PARKING

Residential parking

- 17.1.46. Local Plan Policy EC2 highlights that the Council will promote a 'car free' or 'low car' development. Part (d) states that it will use the standards established in the London Plan.
- 17.1.47. The Intend to Publish London Plan sets maximum standards of up to 0.5 spaces per dwelling based on a combined PTAL rating of two and three.
- 17.1.48. Car parking will be provided across two parking levels located above the Tesco Extra store. Some additional residential car parking will also be provided at basement level of the development
- 17.1.49. The scheme provides 100 car parking spaces dedicated to the 473 residential units proposed on site. Three residential visitor car parking spaces and two car club spaces are also provided for the benefit of the residents.
- 17.1.50. This accords with maximum parking standards set out in the Intend to Publish London Plan and pre-application advice received from the GLA and LB Hounslow.

Retail parking

- 17.1.51. The Intend to Publish London Plan Policy T6.3 requires one space per 75sqm GIA for retail development. This would permit 108 spaces based on the GIA of the retail area being 8,000sqm.
- 17.1.52. The retail car parking will be provided across two parking levels located above the Tesco Extra store.
- 17.1.53. The existing Tesco store consists of circa. 614 parking spaces and the relocated store will reduce the number of spaces down to 400 spaces.
- 17.1.54. Whilst the existing Tesco store includes a petrol filling station, this facility will not be re-provided as part of the proposed development and therefore highlights a reduced need for retail car parking spaces as the trips for food hopping and petrol filling will no longer be linked.
- 17.1.55. The amount of car parking provided on site has been agreed with Tesco and statutory consultees and has been minimised with no more retail parking provided than is required for operational and viable commercial purposes.
- 17.1.56. The proposed reduction in retail parking spaces has the ability to encourage a modal shift away from the use of the private car to more sustainable modes of transport in line with London Plan and Local Plan objectives. The significantly minimised number of parking spaces associated with the new Tesco store should be given significant weight given the existing Tesco parking provision which is to be lost is in close proximity to the site.
- 17.1.57. In summary, 400 parking spaces will be provided in association with the proposed relocated Tesco store. Of these spaces, 24 would be designated disabled bays and 16 will be marked for families with small children. Amongst the 400 spaces, it is anticipated that there will be 19 dedicated spaces to Click+Collect and Car Wash facilities.
- 17.1.58. Whilst the proposed parking provision complies with the current London Plan standards, the GLA and TfL noted that the maximum standards do not comply with the emerging London Plan but acknowledged that there would be a substantial overall reduction in parking provision, based on the existing situation as well as a number of wider public benefits associated with the development and so found the parking provision to be acceptable.

- 17.1.59. In line with the TfL pre-app response, a Car Park Management Plan has been prepared which includes measures discourage overuse of the car park including a charging mechanism to limit usage by those not completing the 'Main / large shop for the week'.
- 17.1.60. Furthermore, it has been demonstrated within the Design and Access Statement how the podium level parking can be repurposed for alternative uses should the need for car parking fall as people move towards more sustainable travel.

Blue badge parking

- 17.1.61. Paragraph 110 of the NPPF states that applications for development should address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
- 17.1.62. For residential parking, the Intend to Publish London Plan Policy T6.1 requires 3% of dwellings to have blue badge bays. Therefore, 14 spaces would be designed disabled bays to comply with the standards.
- 17.1.63. For retail parking, the Intend to Publish London Plan Table 10.6 requires that 6% of the total car parking provision be designated bays. As previously mentioned, out of the retail parking spaces proposed, 20 would be designated disabled/enlarged bays to comply with the standards.

Electric charging points

- 17.1.64. The Intend to Publish London Plan sets out standards for the provision of both active and passive charging points. Emerging Policy T6.1 states that 20% of parking spaces should have active provision for residential developments and that there should be passive provision for all remaining spaces. However, the currently adopted London Plan (2016) does specifically refer to a 10% active provision for retail development. In terms of retail developments, emerging Policy T6.1 also requires that provision for rapid electric vehicle charging be made.
- 17.1.65. Electric vehicle charge points will be provided for 10% of all parking spaces on first site occupation in line with the adopted London Plan, with passive provision made that all car parking on site could have access to an electric car charge point in the future if required to meet the Intend to Publish London Plan standards.
- 17.1.66. The submitted Transport Assessment provide further details of the car parking proposals.

CYCLE PARKING

- 17.1.67. Cycle parking for both residential and retail uses on the development site will be provided in accordance with the Intend to Publish London Plan minimum cycle parking standards as well as having regard to the LCDN/Westrans cycle parking guidance. All cycle parking has been designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS)9.

Residential cycle parking

- 17.1.68. Westrans Cycle Parking standards dictate that short stay parking should be adjacent and no further than 15 metres from the main entrance. As a general rule, it should be closer than the nearest non-disabled car parking bay or adjacent to the entrance, clearly signed off and covered.
- 17.1.69. For long-stay parking, Westrans standards indicate that the provision should be no further than 50 metres from entrances, covered and secured.

- 17.1.70. The Transport Assessment calculates that 896 cycle parking spaces are required for the 480 residential units and this has been provided both in the form of oversized cycle parking in bike hoops and standard cycle parking as bike stackers which is in line with Intend to Publish London Plan standards and GLA pre-application advice.
- 17.1.71. The residential cycle parking spaces will be provided within cycle stores which will be served by a cycle lift, accessed from street level along Syon Gate Way. There will also be a separate visitors' short-stay cycle store and Sheffield stands provided in a separate store on the lower ground floor along Syon Gate Way. The residential core cycle lifts have been increased in size following pre-application advice received from LB Hounslow.
- 17.1.72. Overall, as set out in the Residential Travel Plan, a substantial level of cycle parking provision is proposed to the residential units which will encourage future occupiers of the development to cycle.

Retail cycle parking

- 17.1.73. The Intend to Publish London Plan sets out the TfL standards for long- and short-term retail cycle parking. The Transport Assessment calculates that 116 short stay cycle parking spaces and 88 long stay spaces are required for staff for the Tesco store and this has been provided in the form bike hoops.
- 17.1.74. Long-stay cycle parking spaces for Tesco staff will be provided in a dedicated cycle store on the lower ground floor of the Development, along Syon Gate Way and short-stay cycle parking spaces for customers will be provided along the public realm on Syon Lane and by the Tesco store entrance.

TRAVEL PLAN

- 17.1.75. The NPPF states in Paragraph 111 that all developments that generate significant amounts of movement should be required to provide a Travel Plan so that the likely impacts can be assessed. In line with the Council's advice, separate travel plans have been prepared for the workplace and residential elements of the proposed development.

Residential

- 17.1.76. The submitted Residential Travel Plan confirms that the site is well positioned in terms of proximity to public transport services, as well as access to good pedestrian and cycle infrastructure. Syon Lane station is considered to be a key destination for pedestrians. The Travel Plan highlights the number of existing pedestrian crossing points and cycle routes and cycle parking facilities near to the site which contribute to existing accessibility by foot and cycle respectively.
- 17.1.77. The Residential Travel Plan sets out the residential travel plan measures and responsibilities which include both hard and soft measures as well as on-site car parking restrictions that will limit the ability of most households to own and park a car on site.
- 17.1.78. Table 4.2 within the residential travel plan sets out the nearby car club provision. In total, there are seven car club vehicles within approximately 1,700m walking distance of the site. As part of the scheme, there is also the intention to provide two car club car spaces within the development itself which will be available for future residents.
- 17.1.79. To understand the effect of the hard and soft measures imposed as part of the proposed development and to understand their influence on travel patterns, the travel plan suggests

monitoring surveys are taken in Year 1 of the site's occupation and for this to be repeated in Year 3 and Year 5. A detailed action plan can be found in the submitted Residential Travel Plan.

Retail

- 17.1.80. The submitted Framework Workplace Travel Plan identifies identical site characteristics in terms of transport and accessibility. It should be noted that the proposed Tesco store, as a leading UK retailer, is committed to reducing its environmental impacts as part of an ongoing programme of Corporate Responsibility. Further details of this can be found in the Framework Workplace Travel Plan.
- 17.1.81. The main focal point for pedestrian access will be at the north western frontage of the site at the junction of Syon Lane and Great West Road (Gillette Corner). Pedestrian access routes to residential cores are provided at all four frontages of the site distributing pedestrian access/egress patterns across the peripheries of the site.
- 17.1.82. In terms of logistics, other Tesco store Travel Plans indicate that Tesco are employing new and improving ordering and distribution systems to ensure a minimum number of HGV's visit the stores.
- 17.1.83. To understand the effect of the hard and soft measures imposed as part of the proposed development and to understand their influence on travel patterns, the Travel Plan suggest monitoring will be on-going and that monitoring surveys will be undertaken in the form of staff and customer questionnaire survey.
- 17.1.84. There will also be a number of promotional strategies including Staff Travel Packs, Notice Boards and 'Welcome to your store' packs which will be distributed to new customers. The purpose of these strategies is to expose the new sustainable transport options and influencing visitors and residents to consider alternative options.
- 17.1.85. Overall, the cycle and pedestrian infrastructure proposed as part of the site coming forward for redevelopment will provide a healthy alternative to private car use to both the residential and retail occupiers and visitor of the development. The implementation of this infrastructure prior to the occupation of the development will provide a pedestrian and cyclist friendly environment.

SERVICING AND DELIVERIES

- 17.1.86. The Transport Assessment confirms that all delivery and servicing is proposed to be undertaken off-street, with vehicles to enter and exit the site in forward gear. A separate Delivery and Servicing Plan has been prepared by RHDHV and submitted with this application.
- 17.1.87. Syon Gateway will serve as the point of access for all servicing vehicles accessing the site. The junction of Syon Gateway takes the form of a simple priority junction.
- 17.1.88. For the proposed Tesco store, delivery vehicles would access the site from Syon Gate Way, located to the south of the site and these would be directed to the dedicated Tesco servicing yard. Swept path analysis confirms that sufficient space will be provided to allow the turning of vehicles and to be able to accommodate more than one service vehicle at one time. Tesco staff will attend to all deliveries and accept all goods for dissemination through the BOH area. Further details of the delivery and servicing arrangements for the proposed retail store can be found in the submitted Delivery and Servicing Plan.

- 17.1.89. In terms of the servicing and delivery arrangements for the residential development, the Residential Travel Plan sets out that the proposed anticipated servicing trips will be 29 inbound and 29 outbound. On average, this would equate to four deliveries per hour.
- 17.1.90. Mail and small packages can be posted into mailboxes located on the ground level of each residential building. Suppliers delivering mail and small packages can access the mailboxes via video intercom controlled by the building management staff.
- 17.1.91. Furthermore, it is anticipated that the residential development would be provided with a concierge service. The concierge service will accept deliveries for residents who are not home and so removes the potential for redeliveries and increased trips to the site. Further details of the delivery and servicing arrangements for the proposed residential element of the proposed development can be found in the submitted Delivery and Servicing Plan.
- 17.1.92. For any maintenance activity (expected to be small to medium sized transit vans), these will access the site as above and use the on-site circulation area for maintenance access.
- 17.1.93. Furthermore, an Emergency Access Road at the eastern perimeter of the site is proposed to ensure permanent unobscured access for emergency services to enter and exit the property.

CAR PARK MANAGEMENT

- 17.1.94. A Car Park Management Plan (CPMP) has been prepared in support of the proposed development. The objectives of the CPMP are as follows:
- ┆ Ensure adequate car parking provision is provided to serve the operational requirements of the proposed development;
 - ┆ To facilitate and enforce the appropriate and designated use of the car parking facilities by eligible users;
 - ┆ Limit opportunities for misuse of facilities and to provide a mechanism to implement suitable restrictions to prohibit unauthorised parking practices; and
 - ┆ Monitor the use of the car parking facilities to review usage and to identify any potential changes that may benefit users, the local environment and highway operations.
- 17.1.95. The proposed parking facilities will take the form of a two-tiered podium car park, accessible from the main site access at Syon Lane via a ramped access road. The proposed main site access road will form a signalised intersection with Syon Lane. The proposed car parking facilities are distributed across two storeys, the first tier comprises Tesco customer parking and the second tier includes further customer parking and a segregated area with authorisation gates for residential parking. There will also be further residential car parking at lower level.
- 17.1.96. The CPMP sets out a number of parking management measures including:
- ┆ Car park management responsibilities;
 - ┆ Car park layout and markings;
 - ┆ Allocation and permit system;
 - ┆ Retail customer parking pricing structures;
 - ┆ Potential repurposing of car parking spaces; and
 - ┆ Enforcement process.
- 17.1.97. As discussed earlier, the inclusion of retail customer parking pricing structures as a considered measure of the CPMP is a result of early discussions with TfL. In response to pre-application advice

received, where possible, it will allow prioritising and concessions for those carrying out the 'main weekly shop' or 'large/bulky shop' so as to discourage use of the car as far as possible.

17.1.98. Further details of the above measures are included in the submitted CPMP. The CPMP will be updated periodically and will operate in parallel to the Residential Travel Plan and Framework Workplace Travel Plan which both incorporate a monitoring process.

PROPOSED MITIGATION MEASURES

17.1.99. As well as the above, the proposed development would provide the following transport-related mitigation measures:

- ┆ Improvements to pedestrian environment across Great West Road and Syon Lane, enhancing the connection to Syon Lane station;
- ┆ Dedicated new pedestrian and cycle friendly 'clean air' route will be provided between Syon Lane Station and the Great West Road via Syon Gate Way and new eastern street, Syon Gate Lane;
- ┆ Introduction of a two way right hand turn from the Great West Road to Syon Lane south;
- ┆ Car club provision for two new spaces and electric charging points for vehicles;
- ┆ Improvements to bus services and bus stops including the removal and relocation of bus stop to further east down the Great West Road;
- ┆ Junction signal realignment;
- ┆ Landscaping works around the site including new tree planting and street furniture; and
- ┆ Cycle parking and facilities in accordance with the latest Intend to Publish London Plan minimum standards.

18

ENERGY AND SUSTAINABILITY



18 ENERGY AND SUSTAINABILITY

18.1.1. This section assesses the energy and sustainability credentials of the proposed development in the context of relevant planning policy.

CLIMATE CHANGE AND GREENHOUSE GASES

- 18.1.2. Policy SI1 of the Intend to Publish London Plan relates to minimising greenhouse gas emissions. The policy states that major development should be net zero carbon and should include a detailed energy strategy.
- 18.1.3. Furthermore, Policy EQ2 of the adopted Local Plan states that the Council will promote the highest standards of sustainable design and construction in the development to mitigate and adapt to climate change.
- 18.1.4. Climate change and greenhouse gases adaption and mitigation measures have been integrated into the proposed development and this is included in the Energy and Sustainability Assessment, Air Quality Assessment and Energy Strategy.
- 18.1.5. As part of Berkeley's Group policy programme, Our Vision, sustainability is central to the planning process. All new homes proposed will be designed to achieve high levels of energy and carbon efficiency.
- 18.1.6. Through the provision of efficient building fabrics and low energy lighting, heating and hot water Berkeley will be delivering homes that will produce approximately 50% less CO₂ than the standard home in the UK. The proposed energy strategy for the development includes the use of highly efficient air source heat pumps which will ultimately allow the development to operate at net zero carbon over time. Berkeley will also produce a Zero Carbon Transition Plan for the site that will detail how all new homes will be able to operate at net zero carbon by 2030. More broadly, they will be looking to minimise the impact they are having as a business through implementation of their 'Carbon Positive' programme. This commits Berkeley to reduce emissions across their operations and offset the remaining amount through recognised carbon offset schemes. At St Edward specifically, they are also committed to use only 100% renewable energy across their construction sites and offices which will apply to the Homebase, Brentford site.
- 18.1.7. Mitigation strategies will be integrated to defend against pollution and noise impact of the Great West Road including NO_x filters and tailored facing materials to particularly affected facades. Low parking ratios, electric car charging points, car clubs and improvements to public transport connections will all be incorporated with the aim to assist in efforts to illicit a broader shift in behaviour. Homes will also be adapted to deal with future climate conditions. Design solutions will be implemented to minimise the risk of summertime overheating whilst the developments will address water scarcity through incorporation of rainwater harvesting, drought resilient planting, and minimising resident water consumption through efficient fixtures and fittings. Sustainable drainage systems and green roofs will be employed to better manage rainwater runoff. In total, the development is expected to include 4,537sqm of green/brown roofs.

- 18.1.8. As demonstrated by previous projects across London and the south east, St Edward build homes that are built to last and the continuing success and endurance of their schemes are testament to this.
- 18.1.9. St Edward use durable, strong and reliable materials that ensure longevity of their developments whilst ensuring that all are sustainably sourced.

ENERGY STRATEGY

- 18.1.10. The need for sustainable use of resources and addressing climate change is emphasised in the NPPF, the adopted London Plan policies 5.2 to 57 on climate change and the Intend to Publish London Plan policies GG6, S13 and S17. Proposals to further reduce carbon emissions through the use of zero or low-emission decentralised energy where feasible, prioritising connection to district heating and cooling networks and utilising local secondary heat sources will be encouraged.
- 18.1.11. Further, developments are expected to achieve a minimum 35% on-site reduction in CO₂ emissions beyond Part L of Building regulations from energy efficiency measures alone to reduce energy demand as far as possible. Residential development should achieve 10 per cent and non-residential development should achieve 15 per cent over part L.
- 18.1.12. There is the expectation to achieve the zero carbon homes standard in full on all major developments and, where this cannot be achieved on site, a commitment to offset the shortfall in CO₂ emissions through a carbon offset payment.
- 18.1.13. The thrust of these policies is also reflected in the Adopted Hounslow Local Plan Policy EQ1, where it states that schemes should promote low carbon design and incorporate energy efficiency measures. All major developments will need to connect to, or extend existing decentralised heating, cooling or power networks in the vicinity of the site, unless a feasibility or viability assessment demonstrates that connection is not reasonably possible.
- 18.1.14. The energy strategy has been formulated following the London Plan Energy Hierarchy: Be Lean, Be Clean and Be Green. The Energy Statement that accompanies this application demonstrates how the Applicant meets the objectives of hierarchy, and how the targets for carbon reductions as set out in the London Plan and local policies are met.
- 18.1.15. In line with the new GLA Energy Planning Guidance the estimated CO₂ emissions for the development have been be calculated using SAP 10 carbon emission factors (SAP10.1). This is to better actual carbon emissions from the proposed development compared to Part L 2013 emission factors.
- 18.1.16. A range of advanced Be Lean energy efficiency measures are proposed. They enable the proposed development to exceed the Part L 2013 Target Emissions Rate (TER) and the Target Fabric Energy Efficiency (TFEE) standard for the residential aspects of the Proposed Development, through energy efficiency measures alone, which represents a good level of sustainable design. The CO₂ emission reduction at the Be Lean stage is estimated to be 12% for the residential areas, and 24% for non-residential areas, so an overall reduction of 36% which exceeds the minimum commitment as set out in the Intend to Publish London Plan.
- 18.1.17. In line with the Intend to Publish London Plan, the feasibility of decentralised energy production as a Be Clean measure has been carefully examined. There are no existing district heat networks in proximity to the site. It is considered an on-site energy centre and heat network is feasible. A site wide heat network would be installed, supplying heat from a network sourced by air source heat

pumps and gas boilers. All homes will be connected to the heat network, with connection points provided to all non-residential units (with the exception of the Tesco store which will not connect). Provision will be made for future connection to external heat networks. This delivers a site wide CO2 reduction of 18% over the Part L 2013 baseline.

- 18.1.18. The full spectrum of Be Green renewable energy generating technologies has been considered. As discussed in the Energy Statement, it is not proposed to install PV. The roof spaces provide the opportunity to provide communal amenity space for residents and to provide biodiverse roofs contributing to the urban greening factor and achieving a net gain in biodiversity which is a considerable benefit of the proposals.
- 18.1.19. Overall, a reduction of 36% carbon reduction over Part L 2013 on site from Be Lean, Be Clean and Be Green measures has been achieved. In line with GLA guidance, the development will commit to offset the remaining domestic CO2 emissions through a payment to the London Borough of Hounslow. The remaining CO2 emissions to be offset should be based upon 283 Tonnes CO2 per annum, resulting in the estimated payment of £509,400. This has been calculated assuming the SAP 10 carbon emission factors.

SUSTAINABILITY

- 18.1.20. Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 18.1.21. Policy SI5 of the Intend to Publish London Plan it states that development proposals should achieve at least the BREEAM 'Excellent' standard for the 'Wat 01' water category or equivalent (commercial development).
- 18.1.22. Hounslow Adopted Local Plan Policy EQ2 requires a BREEAM rating of 'Excellent' as a minimum for all developments over 500sqm. Paragraph 9.4 goes on to state that BREEAM will be used to measure performance to ensure that all developments contribute to sustainable development.
- 18.1.23. Through the incorporation of sustainable design and construction methods, energy and water saving measures, waste reduction techniques as well as measures to enhance the ecological value of the site, a good quality and sustainable development is proposed.
- 18.1.24. The key sustainability features outlined in this Sustainability Statement are listed below:
- i BREEAM: The Tesco store will be designed and built to achieve a BREEAM 'Very Good' rating for shell only under the New Construction 2018 scheme with endeavours for 'Excellent'.
 - i Overheating: The scheme has been designed to ensure overheating risk is reduced. The proposed strategy includes window openings and other passive mitigation measures.
 - i Energy strategy: The development will target a 36% reduction in Regulated CO2 emissions through energy-efficiency and a site-wide heat network.
 - i Water efficiency: Flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum internal daily water consumption of 105 litres/person/day.
 - i Waste and recycling: Adequate facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling.
 - i Materials: Where practical, new building materials will be sourced locally to reduce transportation pollution and support the local economy. New materials will be selected based on their environmental impact and responsible suppliers will be used where possible.

- i Flood Risk and SuDS: The development lies in a low risk flood zone. It will benefit from an attenuation and flow control system that collects surface runoff for discharge into a sewer.
- i Security: Consultation with a Security Specialist will take place to ensure the development is safe and secure for its residents.
- i Sound insulation and noise mitigation: The dwellings are to target an improvement on Building Regulations Part E through party walls and floors. An appropriate design will be considered to provide the necessary noise mitigation from external and plant noise sources.
- i Inclusive access: 90% of the new dwellings will be designed to meet Building Regulations Approved Document M4(2) and 10% will meet Part M4(3).
- i Sustainable transport: The site will benefit from a good existing public transport network and sustainable modes will be encouraged through the provision of cycle storage spaces for both the residential and commercial uses.
- i Biodiversity and ecology: Achieving biodiversity net gains through the inclusion of ecological valuable habitats within the landscape strategy.
- i Green/brown roofs: The development is expected to include 4,537 m² of green/brown roofs.
- i Sustainable construction: The site will aim to achieve a 'Beyond Best Practice' score with the considerate Constructors Scheme and will closely monitor construction site impacts.
- i Circular economy: Key circular economy principles have been considered in the design to minimise embodied carbon and operate with a circular economy, maximising the value extracted from materials and prioritising reuse and recycling.

OVERHEATING

- 18.1.25. The Intend to Publish Version of the London Plan Policy SI4 requires that major development demonstrate how they will reduce the potential for overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
- 18.1.26. Minimising the risk of summer overheating and high uncontrollable temperatures is important so as to ensure that homes are comfortable for their occupants and remain so in the future. St Edward Homes Limited commits to ensuring that all dwellings will not have a high risk of summer overheating and will adopt appropriate measures to ensure this is delivered.
- 18.1.27. The recently published Early Stage GHA Overheating Risk Tool helps to identify risk and effective key factors to reduce the risk of overheating in homes. It uses a holistic approach and includes a mixture of information from site context/ geographical location and site/dwelling design characteristics. It scores the risk of overheating as high, medium and low categories. Medium to high risk implies that the design team must incorporate key passive design measures to reduce the risk of overheating.
- 18.1.28. The scheme scores at very high risk of overheating, mainly caused by geographical location and the site's constraints including traffic noise from the GWC, adjacent railway noise and being under an aircraft path.
- 18.1.29. Throughout the design process, St Edward and the design team has developed a fabric specification that takes into account multiple issues and the environmental considerations. These include: building form and massing and its impact on energy efficiency; noise impact; air quality; sunlight and daylight; the internal overheating of dwellings; and CIBSE TM59 compliance.
- 18.1.30. Given the noise context, an initial overheating dynamic thermal modelling has been carried out to balance thermal and acoustical comfort as well as natural daylight provision.

- 18.1.31. In accordance with the GLA's cooling hierarchy, the applicant has completed an assessment of overheating risk with a specification for passive, non-mechanical measures as mitigation prior to assessing mechanical options for cooling. Overheating has been assessed against Chartered Institute of Building Services Engineers (CIBSE) TM59 methodology.
- 18.1.32. For the purposes of the assessment undertaken, it is assumed that homes will utilise openable windows as the primary means of ventilation, with a background mechanical ventilation system. External noise levels as well as air quality impact has been considered in developing the overheating strategy. Air quality deemed to be within acceptable levels and allows the use of openable windows (ES Chapter, Buro Happold) while the ventilation strategy has been designed to limit the occupants' exposure to external noise.
- 18.1.33. The modelling has been carried out on a sample of dwellings from the scheme. As standard practice, homes have been selected for the overheating assessment based on design characteristics that establish them as representative of the overall proposed scheme. The selection of the homes for overheating risk assessment was based among other parameters on the design characteristics:
- i Units with large glazed areas;
 - i Single aspect homes lacking cross ventilation and double aspects units;
 - i Upper floor homes lacking beneficial shading effect from balcony overhangs above them and mid-floor levels shaded by balconies;
 - i Homes located in different orientations, floor levels and across all the building blocks of the development; and
 - i Window openability constraints due to external noise was also accounted.
- 18.1.34. A representative communal corridor, associated with the assessed homes, was also selected for the overheating assessment. The representative sample demonstrates that the units are broadly in compliance with the guidance.
- 18.1.35. The results of this assessment are presented in the Dynamic Overheating Assessment report appended to the Sustainability Report. This report includes results from dynamic overheating modelling in line with CIBSE TM59, plus the GHA domestic overheating checklist.
- 18.1.36. The results indicate that the development has incorporated as many passive design solutions as practical following the cooling hierarchy and effectively accounting for noise constraints to reduce the risk of overheating. These include the following:
- i Highly efficient fabric envelope and high efficiency building services heating system, lightings and appliances are proposed in all dwellings to reduce internal gains;
 - i High performance solar control glazing with a g-value of 0.4 is proposed for all windows across the scheme. This has been balanced out to achieve fabric energy efficiency target and natural daylight provisions;
 - i Glazing ratio has been maximised across the scheme and it has been reduced closer to 35% in accordance with Good Homes Alliance recommendations for mitigating overheating risk;
 - i Windowsill height has been raised by 1100mm and the bottom pane has been substituted with an opaque panel in bedrooms on sensitive noise facades (Blocks B and C) to reduce excessive solar gains;

- i Window openability has been maximised to enable natural ventilation. All windows are fitted with restrictors, but the future occupants will have the freedom to unlock them to allow for more ventilation during the hottest months;
- i External shading in form of balconies and overhangs have been strategically arranged across the blocks. For instance, balconies on western and eastern facades (Blocks D and E) have been shifted to provide shade to kitchen/living rooms and adjacent bedrooms at the same time. Where possible bedrooms have been located behind balconies to allow for additional shade;
- i Dual-aspect units and semi-dual aspect dwellings have been maximised across the scheme. Semi-dual aspect units employ recessed balconies to enable one room to have windows on adjacent walls and enhance cross-ventilation;
- i Planting trees and vegetation to provide a natural screen to glazed areas of the dwellings on the podium level;
- i Made use of concrete structure within the floor slab which provides some thermal capacity to absorb excessive heat within the building; and
- i Increased mechanical ventilation rates up to 1.0ACH to assist natural ventilation in mitigating the risk of overheating.

18.1.37. The results indicate that, based on windows being open during occupied time in kitchen/living rooms during the day and bedrooms 24/7 all assessed rooms meet the TM59 criteria and achieve acceptable internal comfort levels far below the TM59 threshold targets. This demonstrates that the proposed development has identified robust passive design measures which effectively mitigates the risk of overheating.

18.1.38. In the existing noise context, where window opening times are limited to certain hours of the day, the results of the assessment show that kitchen/living rooms continue to meet TM59 requirements, but with windows closed for acoustic reasons there are some exceedances of bedroom overheating. The results indicate that bedrooms tend to slightly exceed the TM59 criteria by a relatively small number of hours, which is the equivalent to 0.4% a year during the hottest days of the summer.

18.1.39. Throughout the design process, St Edward and the design team has developed a fabric specification that takes into account the site constraints and environmental consideration. These include; building form and massing and its impact on energy efficiency; noise impact, air quality, sunlight and daylight; the internal overheating of dwellings and CIBSE TM59 compliance.

18.1.40. The proposed development has incorporated as many passive design solutions as feasible following the cooling hierarchy and effectively accounting for noise constraints. Multiple iterations and scenarios were tested in order to ensure that compliance with the overheating requirements was achieved as far as possible. There is the intention to further investigate the opportunity to mitigate the residual risk of overheating identified in the bedrooms through dynamic modelling at detailed condition stage.

19

ENVIRONMENT



19 ENVIRONMENT

- 19.1.1. This section sets out the how the proposed development will enhance the local environment by introducing new areas of planting, vegetation and trees. It will also consider flood risk and SUDS, land contamination, wind microclimate, lighting, waste, population and human health, accidents and disasters and fire risk.
- 19.1.2. This section should be read alongside the Environmental Statement submitted alongside the application, as well as host of technical reports.
- 19.1.3. There are no ecological designations on or close to the site. The closest statutory ecological designation to the site is Syon Park SSS1 located approximately 1.1km southeast of the site. The site is of low ecological value and as earlier described, consists mostly of buildings and car park hardstanding with some shrub planting.

TREES

- 19.1.4. The GWC is a harsh environment with major transport routes not only having a negative impact on the character and appearance of the area, but also resulting in poor air quality. Trees can act as a major contributor to improving the character of the area and remedying the levels of air pollutants.
- 19.1.5. The proposed development has ensured that wherever possible, existing trees of value have been retained in the publicly accessible areas around Syon Lane and the Great West Road. Where the removal of trees has been deemed necessary to enable the development, high quality replacement trees will be secured. At podium level, the landscaping plan proposes an assortment of new trees to enhance the residential amenity space.
- 19.1.6. This is in line with Adopted Local Plan Policy G5 which states that major development should include high quality landscaping including trees and green infrastructure to contribute to the public realm.
- 19.1.7. Overall, 171 trees will be incorporated as a result of the proposed development. At podium level, 121 small trees/multi-stems will be provided. 41 trees/multi-stems will be provided within the application boundary at ground floor level. Six trees outside of the application boundary along Syon Lane will be replaced three new trees will be planted along the Great West Road and secured under a S278 Agreement. The Tree Planting Plan within Landscape Statement shows the location of proposed trees.

ECOLOGY AND BIODIVERSITY

- 19.1.8. A key objective in the NPPF is to protect the natural environment and to improve biodiversity (paragraph 8). Paragraph 170 of the NPPF seeks to protect valued landscapes and sites of biodiversity value, and to promote net gains in biodiversity.
- 19.1.9. Policy 7.19 of the adopted London Plan states that the Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature and taking opportunities for positive gains for nature.

- 19.1.10. Policy GB7 of the Local Plan states that the council will protect and enhance the natural environment and seek to increase the quantity and quality of the borough's biodiversity. The council expects development proposals to contribute to the greening of the borough through a range of measures to result in a net gain for biodiversity in the borough.
- 19.1.11. Derek Finnie Associates have prepared an Ecological and Biodiversity Assessment based on an Extended Phase 1 Habitat Survey, to support the Homebase scheme. This outlines the current ecological status of the Homebase site, its ecological constraints to any future development and the options considered for biodiversity enhancement as part of the proposals.
- 19.1.12. The site has no ecological designations and there are no designations in close proximity to the site. The closest statutory ecological designation to the site is the Syon Park Site of Special Scientific Interest (SSSI), located approximately 1.1km southeast of the site. The site is of low ecological value, comprising of a single storey Homebase building and hardstanding surrounded by introduced shrub planting along the boundaries of the Great West Road and Syon Lane.
- 19.1.13. The submitted Ecological Assessment and Biodiversity Assessment concludes that there are no habitats or species of value identified within the site and the site has been assessed as being of negligible ecological value. A small area of Japanese knotweed is known to be present within the site and will be carefully controlled or removed to ensure it does not spread throughout the site.
- 19.1.14. The following Phase 1 habitats were encountered within the Homebase site:
- ┆ Scattered trees
 - ┆ Introduced shrub; and
 - ┆ Building and hardstanding.
- 19.1.15. Biodiversity net gains will be achieved through the inclusion of ecological valuable habitats within the landscape strategy. The Ecological and Biodiversity Assessment states that the following biodiversity improvements will be incorporated into the scheme:
- ┆ approximately 239sqm of native hedgerow;
 - ┆ over 1500sqm of wildlife friendly shrub and perennial planting;
 - ┆ almost 40sqm of wildflower meadow;
 - ┆ rockery with alpine planting covering over 180sqm;
 - ┆ over 1,100sqm of species rich lawn; and
 - ┆ 4,500sqm green/brown roof.
- 19.1.16. Bat and bird boxes, as well as insect hotels will be installed in suitable locations wherever possible.
- 19.1.17. Overall, the proposed development will provide new areas of planting and vegetation and street tree planting, which will improve the extent and quality of habitat on the site. This is a dramatic improvement on the current ecological value of the site. The layout of the above biodiversity improvements within the scheme have been designed so as to create increased ecological permeability through and around the site.
- 19.1.18. This in keeping with the key objectives of the NPPF and complies with the relevant local and London Plan policies with regard to ensuring positive gains to biodiversity.
- 19.1.19. Policy G5 states that major development proposals should contribute to the greening of London, including urban greening as a fundamental element of site and built design and by incorporating measures such as high-quality landscaping (including trees).

19.1.20. As the Biodiversity Report and DAS confirms, the Urban Greening Factor is estimated at 0.4 through the incorporation of podium and public realm planting and incorporation of green roofs which is a betterment of the GLA's recommended target of 0.4.

FLOOD RISK AND WATER RESOURCES

- 19.1.21. Hounslow's Local Plan states that of the 96,000 properties in the borough, approximately 16,000 (or 15%) are at risk from flooding in the scenario of a one in 1,000-year event. Local Plan Policy EQ3 relates to flood risk and surface water management. The policy seeks that flood risk is reduced by ensuring that developments are located appropriately and incorporate any necessary flood resistance and resilience measures. Surface water will be managed through an increased emphasis on sustainable drainage.
- 19.1.22. The site is located within Flood Zone 1 and is at a low risk of flooding. Given a large part of the site is already covered in buildings and hardstanding as a result of the existing Homebase store, it is not anticipated that there will be significant effects as a result of the proposed development. Given the sites area and in line with Policy EQ3, a Flood Risk Assessment (FRA) and Sustainable Drainage Strategy (SuDS) has been submitted with the application.
- 19.1.23. The FRA and SuDS have been carried out in accordance with the NPPF and technical guidance. It provides a review of parts of the planning framework and the requirements to apply the Sequential Test and Exceptions Test. The FRA assesses the risk to the site from flooding from all sources and reviews the potential effects of climate change on the site.
- 19.1.24. In terms of tidal flooding, the FRA prepared by AECOM found that during the existing and future climate change scenario up to 2125, the site is at a low risk of flooding from tidal sources resulting from overtopping of the defences during events that exceed a 0.5% AEP (1 in 200 chance of flooding). For the future climate change scenario, it is also considered low risk in the event that the defences were to breach during either 0.5% or 0.1% (1 in 1000 chance) events. Therefore, no mitigation measures are required.
- 19.1.25. In terms of fluvial sources and artificial sources, the site is considered to be at a low risk. The surface water runoff risk is low to medium risk and so surface water discharge will be restricted to 5l/s in accordance with the requirements of the London Plan SPG. The FRA confirms that surface water runoff attenuation will be provided to ensure the restricted runoff rate runoff rate is maintained up to the 1% AEP event plus a 40% allowance for climate change.
- 19.1.26. Following the application of the drainage and SuDS hierarchy, it is proposed that surface water attenuation in the form of oversized pipes will be provided at the Homebase site. The FRA proposes that the discharge rates from the attenuation storage will be controlled by the use of a HydroBrake feature and released into the existing drainage infrastructure surrounding the site. Water will then continue to follow the existing drainage mechanism.
- 19.1.27. The risk of groundwater flooding is also considered low to medium however the development proposes basement levels and so mitigation measures are required to reduce the risk of groundwater flooding to underground structures.
- 19.1.28. Whilst there is limited flood risk, and that which has been identified is being carefully mitigation, a number of additional strategies have been considered to ensure the operation of the site is maintained if a flood occurs. Strategies include providing flood resistance and resilience measures

into the design of the building and designing for potential failure, maintenance and capacity exceedance of the surface water drainage network.

- 19.1.29. Waterman have prepared a drainage strategy which has been prepared in line with the Mayor's drainage strategy and this is appended to the FRA. This includes the required drainage forms for the proposed redevelopment of the Homebase site.
- 19.1.30. The proposed surface water design collects runoff from the roof of the proposed building and surrounding hard landscaped areas within the site. To attenuate runoff, Tubosider large diameter corrugated steel pipes and a Hydro- Brake for gradual release into the River Thames surface sewer is proposed. This sewer is located in Syon Lane.
- 19.1.31. It is proposed to discharge at a rate of 5 l/s (a rounded-up greenfield runoff rate based on HR Wallingford advise to avoid blockages). Waterman's strategy states that this will have the added benefit of helping reduce the amount of flooding occurring within the site should the system be overwhelmed during storm events exceeding the 1:100 year + 40% CC when compared to the 2.2 l/s discharge rate, especially during a long duration storm event. The proposed 5 l/s discharge rate will reduce the runoff rate from the site compared to the existing by 95% in the 1-year storm event and up to 98.7% in the 100-year storm event.
- 19.1.32. These strategies ensure that surface water run-off is managed as close to source as possible. It is anticipated that the drainage network for the site will discharge to a surface water sewer. SuDS measures are to be used to provide attenuation storage for the development so that water can be discharged to the public sewer at reduced runoff rates

LAND CONTAMINATION

- 19.1.33. The site has historically been occupied by a variety of industrial uses including a winery and associated warehousing. Most recently and currently, the site is occupied by a functioning Homebase store.
- 19.1.34. The submitted Geo-Environmental Assessment has been prepared for the site which assessed the potential for contamination associated with the site's former, current and proposed land uses. The assessment found that no significant levels of contamination are present at the site. The report found a residual slightly elevated concentration of hydrocarbons in soils, the presence of asbestos in soles and the presence of some residual hydrocarbon contamination in ground water and perched water at the site. However, the Geo-Environmental Assessment concludes that these samples pose a low residual risk to future site users.
- 19.1.35. The proposed development is part of a strategic opportunity to regenerate poor quality site for a high-quality residential-led development. Post development, the findings of the assessment conclude that the site would be of low risk and not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 and the requirements of Paragraph 178 of the NPPF would be met. This complies with the requirements of Policy EQ8 of the Local Plan and should therefore be acceptable.

WASTE

- 19.1.36. Whilst waste will be generated during the demolition phase of the development by virtue of the existing building on site as well as through the construction and demolition phase, much of the material on the site will be either reused or recycled for use off and on the site and this is set out clearly in the Waste Strategy submitted as part of the Environment Statement.

- 19.1.37. The strategy concludes that there are no significant effects as a result of the proposed development.
- 19.1.38. The water waste strategy prepared by Waterman confirms that the proposed foul water network collects discharge from the Tesco store, residential blocks, car parks and basement. The foul water collected will discharge into the Thames Water foul water sewer located in Syon Lane.
- 19.1.39. To confirm, the proposed discharge rates associated with the drainage systems described above have been approved by Thames Water however, both discharge rates and design philosophy are subject to change upon review by London Borough of Hounslow and as a result of detailed design development subject to condition.
- 19.1.40. The Operational Waste and Recycling Management Strategy submitted as part of this application provides further details of the waste management strategy for each of the proposed uses and occupiers as part of the operational development.

ACCIDENTS AND DISASTERS

- 19.1.41. Policy D11 of the Intend to Publish London Plan relates to safety, security and resilience to emergency. Development proposals should maximise building resilience and minimise potential physical risk, including those arising as a result of extreme weather, fire, flood and related hazards.
- 19.1.42. The proposed development is primarily residential and commercial in nature. As stated in the Environmental Statement, the proposed uses are not considered to be hazardous and the site is not in a location which is at risk of disasters, instability or earthquakes.
- 19.1.43. During construction, which is considered to be the only element which has the potential to be hazardous, all applicable health and safety legislation will be complied with in the detailed Construction Method Statement.

CONSTRUCTION IMPACTS

- 19.1.44. In line with LB Hounslow validation requirements, an Outline Design and Construction Method Statement and Construction and Environment Management Plan has been prepared to accompany the application. Details are provided to demonstrate how impacts will be managed during the demolition/construction phase including impacts relating to noise, air quality, transport etc. Detailed reports will be subject to condition and will be agreed in consultation with LB Hounslow.
- 19.1.45. An Outline Construction Logistics Plan has also been (OCLP) prepared to accompany the application. This outlines the proposed management of traffic during the demolition and construction periods. It provides a framework demolition and construction strategy that will seek to minimise the potential disruption to local residents and other users of the adjacent highway network. This takes into consideration the guidance contained within TfL's 'Construction Logistics Plan Guidance (July 2017) and seeks to minimise the impact of demolition and construction traffic on nearby roads.
- 19.1.46. The objectives of the OCLP are to reduce the environmental impact, risks to road users, congestion and cost. The OCLP also sets out the sub-objectives, agreed in principle, in order to realise these objectives. The sub-objectives are as follows:
- i Encourage construction workers to travel to the Site by non-car modes of travel;
 - i Promote smarter operations that reduce the need for construction travel or that reduce or eliminate trips in peak periods;
 - i Encourage the use of sustainable freight modes of travel;

- | Encourage the use of greener vehicles;
- | Manage the on-going development and delivery of the CLP with building contractor;
- | Ensure the communication of measures contained within the CLP to workers and suppliers;
and
- | Encourage environmentally friendly use of construction freight vehicles.

19.1.47. It is envisaged that the construction programme will extend for 282 working weeks, with works being undertaken from 08:00 to 18:00, Monday to Friday, and from 08:00 to 13:00 on a Saturday. The anticipated start date for the construction works is in the fourth quarter of 2020, with completion envisaged for the third quarter of 2026.

19.1.48. The client and Principal Contractor will ensure that all construction vehicles arriving at the site comply with sufficient safety measures and requirements. All vehicle and driver management practices will comply with FORS and CLOCS.

19.1.49. Measures will be adopted to encourage site workers to travel to the site by non-car modes. Secure cycle parking will be provided on-site within the main site compound and within close vicinity of the on-site offices and welfare facilities, encouraging construction workers to cycle to and from the site.

19.1.50. The OCLP confirms that the number of additional vehicles generated due to construction is not anticipated to have a major impact on traffic flows on the network in the vicinity of the site.

19.1.51. Subsequent to planning permission being granted, and once a main contractor is appointed, a detailed Construction Logistics Plan will be prepared which will provide additional information to support the site's construction and associated traffic management measures.

20

SUMMARY AND CONCLUSIONS



20 SUMMARY AND CONCLUSIONS

COMPLIANCE WITH THE DEVELOPMENT PLAN

- 20.1.1. This Planning Statement has been prepared by WSP in connection with the proposed redevelopment of the Homebase site to deliver a residential led mixed-use scheme, incorporating a replacement Tesco store.
- 20.1.2. The reuse of previously developed land is supported by paragraph 117 and 118 of the NPPF which promote the effective use of land, in particular, making as much as possible use of brownfield sites. The proposal also supports the aspirations of the Intend to Publish London Plan in that boroughs should optimise the potential for housing delivery on all suitable and alternative brownfield sites in accessible locations close to train stations.
- 20.1.3. The principle of retail use on the site considered an acceptable and sustainable use of the site and as it has been demonstrated will not result in significant adverse impact to the four town centres and neighbourhood centres in line with Paragraph 189 of the NPPF and Policy TC3 of the adopted Hounslow Local Plan.
- 20.1.4. The principle of use is supported by planning policy at all levels, including the NPPF, adopted London Plan and Intend to Publish London Plan policies and Hounslow Local Plan policies.
- 20.1.5. There is a significant need for housing in the borough and in London as a whole and the redevelopment of the Homebase site would help deliver 473 new homes for Londoners, including 164 LAR affordable housing. There is also an under deliver of homes in the borough, which the proposed development would go towards addressing.

CONTRIBUTION TO THE GREAT WEST CORRIDOR VISION

- 20.1.6. The site represents an important opportunity to deliver a sustainable residential-led mixed use development at the gateway to the GWC Opportunity Area, alongside the creation of a mixed and inclusive community, a high proportion of quality homes, a new replacement retail use and community facility within a sustainable and liveable location on the GWC.
- 20.1.7. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site.
- 20.1.8. This provides a unique opportunity to unlock the wider strategic development potential of the two sites and release of the 5.45-acre Tesco Osterley Site for comprehensive redevelopment. This will deliver up to 1,677 additional quality new homes with around 725 affordable homes and associated commercial uses, as part of a mixed-use quarter, which will deliver a focal area for new and existing residents and workers.
- 20.1.9. The redevelopment of the Homebase and Tesco sites represents one of the largest regenerative opportunities in London Borough of Hounslow with the capacity to make a substantial contribution towards the strategic target for 7,500 new homes and 14,000 jobs in the GWC Opportunity Area. Providing up to 2,150 new homes, it would deliver more than double the number of homes than any other development in LB Hounslow in at least the last 15 years. Importantly, with around 725

affordable homes the two schemes would also deliver around twice as many affordable homes as any other development.

PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

20.1.10. Paragraph 7 of the NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Paragraph 8 identifies the three overarching and independent objectives:

20.1.11. Paragraph 7 of the NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Paragraph 8 identifies the three overarching and interdependent objectives:

- a) *“economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;*
- c) *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”*

20.1.12. As we have identified in this Statement, the proposed development would contribute to all three objectives:

Economic

20.1.13. The proposed development’s context within the strategic opportunity between the Tesco site and the Homebase Brentford site provides a strong basis for a range of economic benefits. The existing Tesco store will be re-located to a new, enhanced premises and the existing 290 Tesco jobs will be retained, and the number of jobs will increase to potentially 600.

20.1.14. The construction of the two schemes during a ten year construction period will bring a multitude of construction jobs and spending to the area and St Edward Homes will also support a variety of apprenticeships, work placements and training as part of the construction process. Then, when operational, the new residential spending that will come with new residents living in the area is estimated at £49 million a year, of which a significant proportion would be spent in the local economy. The Council Tax receipts from new residents will also be significant.

20.1.15. In addition, the scheme is liable for significant Community Infrastructure Levy payments and a suite of planning obligations have been set out in this report, that will provide economic benefit to the Borough.

Social

20.1.16. The key social benefit to the scheme is the delivery of new homes and a high number of affordable homes. The Borough and London more widely are experiencing high levels of pressure on housing supply and the scheme will provide high quality homes. The proposals will support a range of social benefits for new and existing residents such as state of the art Tesco store, community space and improved public realm, new active frontages and new and safer pedestrian routes and cycle lanes.

20.1.17. The Health Impact Assessment that accompanies the application sets out a range of positive health impacts that will arise as a result of the proposed development. These capture the provision of accessible homes, high quality design, sustainability, provision of social infrastructure, biodiversity, connectivity and benefits to the local economy.

20.1.18. The Community infrastructure Levy payment for the application would capture the scheme's impact and ensure that the Council has sufficient funding to support the new residents and existing communities.

Environmental

20.1.19. The proposed development is of high quality and has responded to the site and surrounding area townscape and heritage assets. It will enhance its environment, at higher levels in the context of the tall buildings along the Great West Corridor whilst respecting the views of heritage assets and the local townscape.

20.1.20. The proposed development will deliver a net gain for biodiversity and an Urban Greening Factor is estimated at 0.4 through the incorporation of podium and public realm planting and incorporation of green roofs which is a betterment of the GLA's recommended target of 0.4.

20.1.21. Finally, the development will target a 36% reduction in Regulated CO2 emissions through energy-efficiency and a site-wide heat network and will contribute a large sum to the carbon offset fund, as well as achieving BREEAM 'Very Good' for shell of the Tesco store, with endeavours for 'Excellent'.

20.1.22. Overall, the proposed development would deliver substantial and wide ranging direct and indirect benefits:

- i Delivery of 473 new high-quality homes, significantly contributing to Hounslow's increased housing target as set out in The Intend to Publish London Plan;
- i A new and modern and sustainable Tesco store of circa 10,550sqm including a 200sqm community space (GIA) with 137 sqm of flexible commercial, business and service space floorspace;
- i 38% high quality, tenure blind new LAR affordable housing by habitable room, in accordance with the Mayor's Fast Track threshold approach;
- i Over 1 acre of residential amenity space with biodiverse podium gardens including open space and children's play space;
- i High quality architecture and a new landmark building to mark the entrance to the GWC;
- i A significant improvement in biodiversity and focus on environmental and ecological enhancements;

- i New active frontages and improved, safer public realm along Syon Lane and the Great West Road;
- i A 36% reduction in carbon emissions and achieving BREEAM 'Very Good' for shell of Tesco, with endeavours for 'Excellent';
- i Improvement to pedestrian environment across Great West Road and Syon Lane, enhancing the connection to Syon Lane station.
- i Dedicated new pedestrian and cycle friendly 'clean air' route will be provided between Syon Lane Station and the Great West Road via Syon Gate Way and new eastern street, Syon Gate Lane.
- i Improvements to bus services and bus stops;
- i Emphasis on green and sustainable travel with policy compliant cycle parking, improved cycle routes, two car club bays, and electric car charging points; and
- i Investment in local infrastructure through the Community Infrastructure Levy and Section 106 contributions.

20.1.23. We consider that the substantial and wide-ranging benefits associated with the proposed development, as identified in the Statement and the supporting documents, would significantly outweigh any adverse impacts. When assessed against the policies in the Framework taken as a whole, the proposed development constitutes sustainable development.

Appendix 1

FULL LIST OF DRAWINGS





Appendix 1

LIST OF EXISTING AND PROPOSED PLANS

- Site Location Plan (ref. 579-PTA-ZZ-ZZ-DR-A-1000);
- Full set of application drawings (existing and proposed, as listed in Appendix A of the Planning Statement):
 - Existing site plan (ref. 579-PTA-ZZ-ZZ-DR-A-0100);
 - Proposed site plan (ref. 579-PTA-ZZ-ZZ-DR-A-1001);
 - Existing lower ground floor plan (ref. 579-PTA-ZZ-00-DR-A-0106);
 - Existing ground floor plan (ref. 579-PTA-ZZ-00-DR-A-0105);
 - Proposed lower ground floor plan (ref. 579-PTA-ZZ-B1-DR-A-1001);
 - Proposed ground floor plan (ref. 579-PTA-ZZ-00-DR-A-1001);
 - Proposed upper ground floor plan (ref. 579-PTA-ZZ-01-DR-A-1001);
 - Proposed level 1 plan (ref. 579-PTA-ZZ-01-DR-A-1001);
 - Proposed level 2 plan (ref. 579-PTA-ZZ-02-DR-A-1001);
 - Proposed level 3 plan (ref. 579-PTA-ZZ-03-DR-A-1001);
 - Proposed level 4 plan (ref. 579-PTA-ZZ-04-DR-A-1001);
 - Proposed level 5 plan (ref. 579-PTA-ZZ-05-DR-A-1001);
 - Proposed level 6 plan (ref. 579-PTA-ZZ-06-DR-A-1001);
 - Proposed level 7 plan (ref. 579-PTA-ZZ-07-DR-A-1001);
 - Proposed level 8 plan (ref. 579-PTA-ZZ-08-DR-A-1001);
 - Proposed level 9 plan (ref. 579-PTA-ZZ-09-DR-A-1001);
 - Proposed level 10 plan (ref. 579-PTA-ZZ-10-DR-A-1001);
 - Proposed level 11 plan (ref. 579-PTA-ZZ-11-DR-A-1001);
 - Proposed level 12 plan (ref. 579-PTA-ZZ-12-DR-A-1001);
 - Proposed level 13 plan (ref. 579-PTA-ZZ-13-DR-A-1001);
 - Proposed level 14 plan (ref. 579-PTA-ZZ-14-DR-A-1001);
 - Proposed level 15 plan (ref. 579-PTA-ZZ-15-DR-A-1001);
 - Proposed level 16 plan (ref. 579-PTA-ZZ-16-DR-A-1001);
 - Proposed roof plan (ref. 579-PTA-ZZ-RF-DR-A-1001);
 - Proposed site block plan (ref. 579-PTA-ZZ-ZZ-DR-A-0051);
 - Existing south west elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0101);
 - Existing south east elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0102);



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- Existing north east elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0103);
- Existing north west elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0104);
- Proposed south west elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0001);
- Proposed south east elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0002);
- Proposed north east elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0003);
- Proposed north west elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0004);
- Proposed south courtyard elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0005);
- Proposed north courtyard elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0006);
- Proposed Block A east courtyard elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0007);
- Proposed Block E west courtyard elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0008);
- Proposed Block E east courtyard elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0009);
- Proposed Block D west courtyard elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0010);
- Proposed Block D east courtyard elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0011);
- Proposed Block C west courtyard elevation (ref. 579-PTA-ZZ-ZZ-ELE-A-0012);
- Existing site section (ref. 579-PTA-ZZ-ZZ-SEC-A-0101);
- Proposed Sections A and B (ref. 579-PTA-ZZ-ZZ-SEC-A-0001); and
- Proposed Sections C and D (ref. 579-PTA-ZZ-ZZ-SEC-A-0002).

Appendix 2

RELEVANT POLICIES



to addressing both the CAZ's strategic functions and its role as a residential area and the need for the range of facilities and infrastructure this entails, taking account of the unique patterns of demand arising from the fact that these are likely to be used by visitors and workers as well as residents.

- 2.57 The quality and character of the CAZ's predominantly residential neighbourhoods should be protected and enhanced. This requires a variety of housing suitable to the needs of the diverse communities living in the area. It is also important, however, to make sure that this does not compromise the strategic functions in other parts of the CAZ.

Opportunity areas and intensification areas

POLICY 2.13 OPPORTUNITY AREAS AND INTENSIFICATION AREAS

Strategic

- A Within the opportunity and intensification areas shown in Map 2.4, the Mayor will:
- a provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realise these areas' growth potential in the terms of Annex 1, recognising that there are different models for carrying these forward; or
 - b build on frameworks already developed ; and
 - c ensure that his agencies (including Transport for London) work collaboratively and with others to identify those opportunity and intensification areas that require public investment and intervention to achieve their growth potential
 - d encourage boroughs to progress and implement planning frameworks to realise the potential of intensification areas in the terms of Annex 1, and will provide strategic support where necessary.

Planning decisions

- B Development proposals within opportunity areas and intensification areas should:
- a support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks
 - b seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses
 - c contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate

through opportunity area planning frameworks and/or local development frameworks

- d realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking
- e support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.

LDF preparation

- C Within LDFs boroughs should develop more detailed policies and proposals for opportunity areas and intensification areas.

- 2.58 Opportunity areas are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. Typically they can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure.
- 2.59 Intensification areas are typically built-up areas with good existing or potential public transport accessibility which can support redevelopment at higher densities. They have significant capacity for new jobs and homes but at a level below that which can be achieved in the opportunity areas.
- 2.60 The broad locations of London's opportunity areas and intensification areas are set out in Map 2.4. The strategic policy directions for London's opportunity areas and intensification areas, and minimum guidelines for housing and indicative estimates for employment capacity, are set out in Annex 1. Together, the opportunity areas have capacity for 575,000 additional jobs and 303,000 additional homes; the intensification areas can accommodate 8,000 new jobs and a further 8,650 homes.
- 2.61 The opportunity areas are diverse, ranging in size from 3,900 hectares (Upper Lee Valley) to 19 hectares (Tottenham Court Road). The 12 areas in east London together cover 9,000 hectares of land, and have capacity for 217,000 jobs (including 110,000 at the Isle of Dogs and 50,000 in the Lower Lee Valley including Stratford) and 126,500 homes (including 32,000 in the Lower Lee Valley and 26,500 at London Riverside). Some, particularly some of those in east London, will require substantial public investment or other intervention to bring forward and these will be given priority in the Mayor's Economic Development Strategy and in the programmes of the GLA Group to address market failure or weakness. In others, such as Tottenham Court Road, the market will be stronger and public intervention can be restricted to ensuring an appropriate planning policy framework. Similar considerations apply to intensification areas. The Mayor expects both types of area to make particularly significant contributions towards

Lea Valley in north London and in the Purley Way/Beddington area to the south.

- 2.83 The boundaries of SILs should be defined in LDFs taking into account strategic and local assessments of supply and demand for industry and joint working on planning frameworks. In collaboration with the Mayor, boroughs should manage the differing offers of PILs and IBPs through co-ordinated investment, regeneration initiatives, transport and environmental improvements and the use of planning agreements. They should also provide local planning guidelines to meet the needs of different types of industry appropriate to each.
- 2.84 Development in SILs for non-industrial or related uses should be resisted other than as part of a strategically co-ordinated process of consolidation, or where it addresses a need for accommodation for SMEs or new emerging industries, or where it provides local, small scale, 'walk to' services for industrial occupiers (workplace crèches for example), or office space ancillary to industrial use. Policing and other community safety infrastructure may also be appropriate uses in these locations.
- 2.85 In the Thames Gateway and parts of north London there is particular scope for strategically co-ordinated consolidation and/or reconfiguration of parts of some SILs. Release of surplus industrial land should be focused around public transport nodes and town centres to enable higher density redevelopment, especially for housing. The Housing SPG provides guidance on exceptional circumstances where densities may exceed the top of the density range for a particular location. This release process must be managed carefully through opportunity area planning frameworks and/or LDFs, taking into account strategic and local assessments of industrial land demand and supply and monitoring benchmarks for industrial land release (see Policy 4.4).

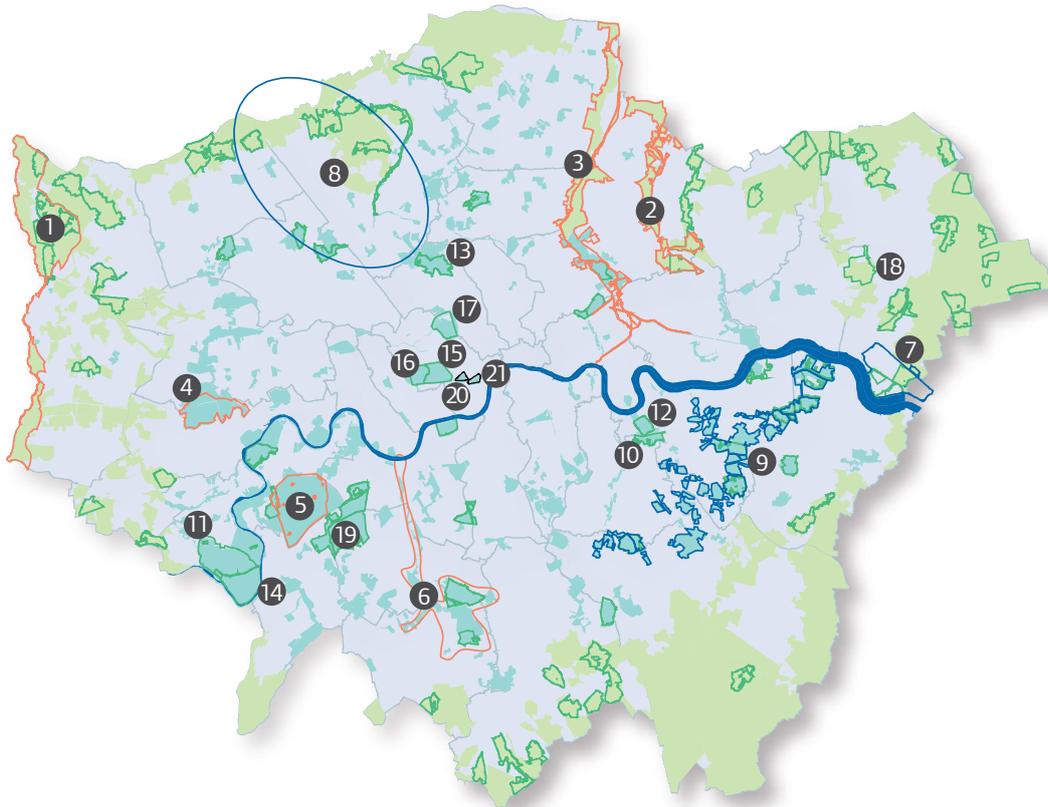
Strategic network of green infrastructure

POLICY 2.18 GREEN INFRASTRUCTURE: THE MULTI FUNCTIONAL NETWORK OF GREEN AND OPEN SPACES

Strategic

- A The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure. This multifunctional network will secure benefits including, but not limited to, biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.
- B The Mayor will pursue the delivery of green infrastructure by working in partnership with all relevant bodies, including across London's boundaries, as with the Green Arc Partnerships and Lee Valley Regional Park Authority. The Mayor has published supplementary guidance on the All London Green Grid to set out the strategic objectives and

Map 2.8 London's strategic open space network



London's Royal, Regional and Metropolitan Parks

- | | | | |
|------------------------|---------------------------------------|-----------------------------------|--------------------------|
| Metropolitan Open Land | Regional Park Opportunities | Metropolitan Parks | Other Royal Parks |
| Green Belt | 7. London Riverside Conservation Park | 10. Blackheath | 20. Green Park* |
| Regional Parks | 8. Northern Area | 11. Bushy Park* | 21. St James's Park* |
| 1. Colne Valley | 9. South East Green Chain | 12. Greenwich Park* | |
| 2. Epping Forest | | 13. Hampstead Heath | |
| 3. Lee Valley | | 14. Hampton Court Home Park | * Indicates a Royal Park |
| 4. Osterley Park | | 15. Hyde Park* | |
| 5. Richmond Park* | | 16. Kensington Gardens* | |
| 6. Wandle Valley | | 17. Regents Park* | |
| | | 18. Thames Chase Community Forest | |
| | | 19. Wimbledon Common | |

Source: GLA
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See also Map 7.5 Blue Ribbon Network and Policy 7.18/Table 7.2

priorities for green infrastructure across London.

- C In areas of deficiency for regional and metropolitan parks, opportunities for the creation of green infrastructure to help address this deficiency should be identified and their implementation should be supported, such as in the Wandle Valley Regional Park¹.

¹ EDAW Ltd. London Strategic Parks Project. GLA, 2004

Planning decisions

- D Enhancements to London's green infrastructure should be sought from development and where a proposal falls within a regional or metropolitan park deficiency area (broadly corresponding to the areas identified as "regional park opportunities" on Map 2.8), it should contribute to addressing this need.
- E Development proposals should:
- a incorporate appropriate elements of green infrastructure that are integrated into the wider network
 - b encourage the linkage of green infrastructure including the Blue Ribbon Network, to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening (Policy 5.10).

LDF preparation

- F Boroughs should:
- a set out a strategic approach to planning positively for the creation, protection, enhancement and management of networks of green infrastructure by producing green infrastructure strategies² that cover all forms of green and open space and the interrelationship between these spaces. These should identify priorities for addressing deficiencies and should set out positive measures for the design and management of all forms of green and open space. Delivery of local biodiversity action plans should be linked to these strategies.
 - b ensure that in and through DPD policies, green infrastructure needs are planned and managed to realise the current and potential value of these to communities and to support delivery of the widest range of linked environmental and social benefits
 - c in London's urban fringe support, through appropriate initiatives, the vision of creating and protecting an extensive and valued recreational landscape of well-connected and accessible countryside around London for both people and wildlife³.

² CLG. National Planning Policy Framework, paragraph 114. Mayor of London/CABE Space. Open Space Strategies Best Practice Guidance. GLA, 2009

³ Land Use Consultants. Bringing the Outdoors Closer to People. Improving the countryside round London: The Green Arc Approach. Green Arc Steering Group, 2004

2.86 In a dense conurbation like London, the network of green and open spaces has to be increasingly multi-functional. The term green infrastructure refers to the network of all green and open spaces together with the Blue Ribbon Network (see Policies 7.24 to 7.30) that provides multiple benefits to Londoners (see Glossary). It functions best when designed and managed as an interdependent 'green

- 3.19i To ensure effective local contributions to meeting London's need for 49,000 more homes per annum, Local Plans should therefore demonstrate how individual boroughs intend to address in terms of Policy 3.3 the relevant minimum housing supply target in Table 3.1 and seek to exceed the target through:
- additional sources of housing capacity, especially that to be brought forward from the types of broad location set out in Policy 3.3;
 - collaborative working with other relevant partners including the Mayor, to ensure that the Local Plan is in general conformity with the London Plan and includes final minimum housing targets identified through the above process; and
 - partnership working with developers, land owners, investors, the Mayor and other relevant agencies to secure the timely translation of approved housing capacity to completions taking account of Policy 3.15.
- 3.19A National policy requires boroughs to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirements, with an additional buffer of 5% moved forward from later in the plan period (or 20% where there has been persistent under delivery). In compiling their 5 year supply estimates boroughs should demonstrate that they have maximised the number of identified sites. However, given London's reliance on recycled land currently in other uses, it must be recognised that in addressing this national policy objective, capacity which elsewhere in the country would be termed 'windfall' must here form part of the 5 year supply. In order to support the range of activities and functions required in London as set out in this Plan, application of the 5% - 20% buffers should not lead to approval of schemes which compromise the need to secure sustainable development as required in the NPPF.

Housing Supply

POLICY 3.3 INCREASING HOUSING SUPPLY

Strategic

- A The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.
- B Working with relevant partners, the Mayor will seek to ensure the housing need identified in paragraphs 3.16a and 3.16b is met particularly through provision consistent with at least an annual average of 42,000 net additional homes across London¹ which will enhance the environment, improve housing choice and affordability and provide

¹ Net additional homes including additional dwellings provided by development and redevelopment, conversion of residential and non-residential property, long term vacant properties brought back into use and household spaces in non-self-contained accommodation.

better quality accommodation for Londoners.

- C This target will be reviewed by 2019/20 and periodically thereafter and provide the basis for monitoring until then.

LDF preparation

- D Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.
- Da Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF
- E Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:
- a intensification (see policies 2.13, 3.4)
 - b town centre renewal, especially centres with good public transport accessibility (see Policy 2.15)
 - c opportunity and intensification areas and growth corridors (see policies 2.13 and 2.3)
 - d mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility (see policies 2.7, 2.11, 4.2-4.4)
 - e sensitive renewal of existing residential areas, especially in areas of good public transport accessibility (see policies 3.4, 3.5, 3.14).
- F Boroughs must identify new, and review existing housing sites for inclusion in LDFs.
- G Boroughs should monitor housing capacity and provision against the average targets in Table 3.1, local housing needs assessments and the sensitivity ranges set out in the SHLAA report and updated in the London Plan Annual Monitoring Report.

- 3.24 Table 3.1 only covers the period 2015 – 2025. LDFs which come forward following publication of this Plan and before its replacement or alteration will not be covered for their full term by the current targets. The Mayor therefore commits to revising the targets by 2019/20. In order to provide guidance for any intervening period, LDFs should roll forward the annual targets in Table 3.1 expressing the rolling target as an indicative figure to be checked and adjusted against any revised housing targets.

- 3.25 Monitoring the housing supply figures is an essential part of the 'plan, monitor and manage' approach taken to ensure that the London Plan delivers as many additional homes each year as is practicable. Annex 4 sets out the components of the targets which the Mayor will use for monitoring supply.
- 3.26 The SHLAA methodology provides for phasing of development of individual sites in the future. However, an annual monitoring target based on the average capacity estimated to come forward over ten years may not fully reflect unique uncertainties in housing output arising from changes in the economy. Boroughs may wish to highlight the implications of these uncertainties for achievement of their targets in their Annual Monitoring Reports (AMR), drawing on the strategic context provided by the SHLAA report, the London Plan AMR and the Housing SPG.

POLICY 3.4 OPTIMISING HOUSING POTENTIAL

Strategic, LDF preparation and planning decisions

- A Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.

- 3.28 A rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6). These broad ranges also provide the framework within which boroughs can refine local approaches to implementation of this strategic policy through their LDFs⁵⁶. Where appropriate, they can also provide a tool for increasing density in situations where transport proposals will improve public transport accessibility in the future. It is important that higher density housing is not automatically seen as requiring high rise development.
- 3.28A Geographically specific guidance on implementation of policy 3.4 is provided for Opportunity and Intensification Areas in paragraphs 2.61 and 2.62; for Town Centres in Policy 2.15 and paragraphs 2.72B – 2.72H and 4.42A-B; for surplus industrial land in paragraphs 2.85 and 4.23 and for other large housing sites in paragraph 3.42. More general guidance on implementation of Policy 3.4 is provided in the Housing SPG including exceptional circumstances where densities above the relevant density range may be justified.

56 CLG NPPF 2012 op cit para 58

capacity, and subject to the wider concerns of this policy, the density of a scheme may be at the higher end of the appropriate density range. Where connectivity and capacity are limited, density should be at the lower end of the appropriate range. The Housing SPG provides further guidance on implementation of this policy in different circumstances including mixed use development, taking into account plot ratio and vertical and horizontal mixes of use.

- 3.31 Residential density figures should be based on net residential area, which includes internal roads and ancillary open spaces. Family housing is generally defined as having three or more bedrooms. Car parking provision should be in accordance with the standards outlined in Chapter 6. The Housing SPG provides guidance on addressing the relationships between car parking provision, development density and levels of public transport accessibility in different types of location.

POLICY 3.5 QUALITY AND DESIGN OF HOUSING DEVELOPMENTS

Strategic

- A Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

Planning decisions and LDF preparation

- B The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- C LDFs should incorporate requirements for accessibility and adaptability¹, minimum space standards² including those set out in Table 3.3, and water efficiency.³ The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process⁴.

1 Requirements M4 (2) and M4 (3) of Schedule 1 to the Building Regulations 2010. HM Government 2015.

2 Technical housing standards – nationally described space standard. DCLG 2015

3 London Plan Policy 5.15

4 Mayor of London, Housing SPG 2016

- D Development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.
- E The Mayor will provide guidance on implementation of this policy that is relevant to all tenures.

Table 3.3 Minimum space standards for new dwellings⁵⁷

Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

Notes to Table 3.3

* Where a one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.

The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m²).

The nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

⁵⁷ New dwellings in this context includes new build, conversion and change of use

challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters, and mitigating the extent of future change; and ensuring easy adaptation to meet the changing and diverse needs of occupiers over their lifetimes. The importance of an effective design process to make sure that the quality of schemes is not compromised as the development proceeds will also be highlighted. This guidance provides a strategic, functional basis for a new vernacular in London's domestic architecture which also places greater weight on complementing and enhancing local context and character.

POLICY 3.6 CHILDREN AND YOUNG PEOPLE'S PLAY AND INFORMAL RECREATION FACILITIES

Strategic

- A The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible.

Planning decisions

- B Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation sets out guidance to assist in this process.

LDF preparation

- C Boroughs should:
- a undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities
 - b produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.

- 3.40 In a densely urbanised city like London, safe and stimulating play facilities are essential for a child's welfare and future development⁶³, as well as preventing health problems such as obesity. However, many children still do not have adequate access to such facilities and some existing provision can be unsuitable. LDFs should address this by providing policies on play provision, including the need for high quality design. Through the development of play strategies, boroughs should ensure the integration of play provision into overall open space

63 CLG NPPF 2012 op cit para 50

strategies. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs. Appropriate provision should be included for different age groups, including consideration of communal space, roof gardens, indoor space for young children and youth-facilities for young people. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Wherever possible, playspace should include grassed or wooded areas. School playing fields also provide an important contribution to high quality play spaces (Policy 3.18).

- 3.41 New development including housing should make provision for playspace. This should normally be made on-site and in accordance with LDF play policies for the area. Where development is to be phased, there should be early implementation of the play space. Off-site provision, including the creation of new facilities, improvements to existing provision and an appropriate financial contribution secured by legal agreement towards this provision may be acceptable where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents.

POLICY 3.7 LARGE RESIDENTIAL DEVELOPMENTS

Strategic, planning decisions and LDF preparation

- A Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility.
- B Those on sites of over five hectares or capable of accommodating more than 500 dwellings should be progressed through an appropriately plan-led process to encourage higher densities and coordinate where necessary provision of social, environmental and other infrastructure and create neighbourhoods with a distinctive character, sense of local pride and civic identity in line with Chapter 7. The planning of these areas should take place with the engagement of local communities and other stakeholders.

- 3.42 Large new developments are planned to make a significant contribution to meeting housing need, and their scale means they have particular potential to define their own characteristics and accommodate higher density development in line with Policy 3.4. Guidance on densities above those outlined in Table 3.2 is set out in the Housing SPG. Large sites provide opportunities to create particularly attractive neighbourhoods with distinctive identities, a good quality public realm (Policy 7.5) and the critical mass to support social, physical and environmental infrastructure and provide employment opportunities⁶⁴. For these new neighbourhoods to be successful, it is essential that they become places where

64 CLG NPPF 2012 op cit para 52

people choose to live and work. A co-ordinated approach to their development is essential.

3.43 Plans for these areas, which may include strategic framework documents such as SPG, site specific DPD policies and proposals for Borough level SPD as appropriate should take particular account of:

- the relationships between the pattern and scale of development and movement within the site, with adjacent areas, and connections with the wider transport network. The highest development densities and most varied mixes of uses should be located where there is the highest public transport accessibility. Planning from the outset for desire line based permeability for pedestrians and cyclists and minimising car dependence will be particularly important;
- other linkages with neighbouring areas so that the new development is designed to be firmly embedded within the wider community. This will require close coordination with service providers as well as existing community organisations (Policy 7.1);
- social infrastructure provision (see Policies 3.16–3.19) with particular attention being paid to access to health, education and other essential services, appropriately phased and coordinated with provision in neighbouring areas so that the development is attractive from the outset as well as being fully sustainable when completed, and takes account of Lifetime Neighbourhood criteria and inclusive design principles (Policies 7.1 and 7.2); and
- the opportunities large scale development provide for decentralised energy generation and provision, sustainable design and construction and coordinated neighbourhood management, especially in securing and maintaining a high quality public realm, safety measures, planting and open space and play provision.

POLICY 3.8 HOUSING CHOICE

Strategic

A Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

LDF preparation and planning decisions

B To inform local application of Policy 3.3 on housing supply and taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:

- a new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different

sectors in meeting these

- a1 the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery
- b provision of affordable family housing is addressed as a strategic priority in LDF policies
- c ninety percent of new housing¹ meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'
- d ten per cent of new housing² meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users
- e account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision
- f account is taken of the needs of particular communities with large families
- g other supported housing needs are identified authoritatively and co-ordinated action is taken to address them in LDF and other relevant plans and strategies
- h strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.
- i the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.
- j appropriate provision is made for the accommodation of service families and custom build, having regard to local need.

¹ Unlike the other standards in this Plan, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use. Additional guidance on the applicable requirements of the Building Regulations (amended 2015) can be found in: Approved Document M Access to and use of buildings Volume 1: Dwellings.

² *ibid*

3.44 Within the broad 20 year requirement for 464,000 (23,200 a year) more market homes and for 512,000 (25,600 a year), additional affordable homes⁶⁵, the Mayor is committed to promoting a real choice of homes for Londoners across the range of tenures to meet their needs at prices they can afford. The SHMA demonstrates the diversity and complexity of London's housing requirements. There is significant need for affordable family homes, and those that meet the requirements of smaller

⁶⁵ Mayor of London. SHMA 2014 *op cit*

- 3.58 The Mayor is concerned that there should be no segregation of London's population by housing tenure. London's legacy of mono-tenure estates has in some cases contributed to concentrations of deprivation and worklessness. Coupled with some housing trends and management practices, these have been exacerbated by the tendency for new social housing to be built in the areas where it is already concentrated. Conversely, market homes have tended to be developed in areas with very little social housing⁹⁰. The affordable rent product should be applied so as to help achieve the objectives of this Policy. Local Authorities' allocation policies, tenancy strategies and homelessness strategies will also be important tools in delivering this aim.
- 3.59 The London Housing Strategy outlines how management and investment in mono-tenure estates can contribute to the creation of more mixed and balanced communities. The planning system should support this process. Infill schemes in predominantly social housing estates should primarily be targeted for intermediate and market housing. New social housing development should be encouraged in areas where it is currently under represented. These are essentially local matters for boroughs to address in light of their local circumstances because the key concern is the concentrations of deprivation in individual, or groups, of mono-tenure estates rather than the overall level of social renting in a borough.
- 3.60 Policy 3.5 requires the design of new development to help create a more socially inclusive London. The Housing SPG provides guidance on implementing this policy including support for boroughs to resist forms of development which might compromise it, such as gated communities.

Affordable Housing

POLICY 3.10 DEFINITION OF AFFORDABLE HOUSING

Strategic and LDF preparation

- A Affordable housing is social rented, affordable rented and intermediate housing (see para 3.61), provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision

- 3.61 Within this overarching definition:
- **social rented housing** should meet the criteria outlined in Policy 3.10 and be owned by local authorities or private registered providers, for which guideline

⁹⁰ Mayor of London LHS 2010 op cit

affordable housing provision. In the absence of local eligibility criteria, in order to recognise strategic housing needs in the particular circumstances of London, the Mayor will seek to ensure that households whose annual income is in the range £18,100-£66,000 should be eligible for new intermediate homes. For family homes (see Glossary) the upper end of this range will be extended to £80,000. These figures will be up-dated annually in the London Plan Annual Monitoring Report. If boroughs wish to set eligibility criteria for intermediate housing below these levels, planning conditions or agreements should secure them at the reduced levels for no more than three months from the point of initial marketing (whether that be when new or at re-sale or re-let) and they should then be offered without further restrictions to those who meet the London-wide eligibility criteria as set out in the London Housing Strategy.

- 3.63 In view of the particular priority the Mayor gives to provision of new affordable homes to meet London's very pressing need, boroughs should give particular weight to the criteria set by national government for the allocation of public resources for affordable housing in setting local plan targets (Policy 3.11) or negotiating provision in private housing or mixed use developments (Policy 3.12) and should avoid imposing any requirements (such as borough-level caps on rent levels for affordable rented housing) that might restrict the numbers of new affordable homes.

POLICY 3.11 AFFORDABLE HOUSING TARGETS

Strategic

- A The Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing

LDF preparation

- B Boroughs should set an overall target in LDFs for the amount of affordable housing provision needed over the plan period in their areas and separate targets for

- social/affordable rented; and
- intermediate

housing and reflect the strategic priority accorded to provision of affordable family housing and to making the best use of available resources to maximise affordable housing output.

- C LDF affordable housing targets should take account of:

- a current and future housing requirements identified in line with Policies 3.8, 3.10 and 3.11
 - b the strategic targets and priority accorded to affordable family housing set out in section A above
 - c the approach to coordinating provision and targets to meet the range of strategic, sub-regional and local affordable housing needs in London set out in Policy 3.8, paragraphs 3.65 - 3.67 and Supplementary Planning Guidance and the Mayor's London Housing Strategy
 - d the need to promote mixed and balanced communities (see Policy 3.9)
 - e capacity to accommodate development including potential sources of supply outlined in para 3.67
 - f the viability of future development, taking into account future resources as far as possible.
- D Affordable housing targets may be expressed in absolute or percentage terms in light of local circumstances, reflecting the priorities in 3.11 A-C above, the borough's contribution towards meeting strategic affordable housing targets in light of the framework set by the Plan and guidance in SPG. They should also provide a robust basis for implementing these targets through the development management process.

3.64 The London SHMA⁹⁴ demonstrates that the high cost of market housing in London makes affordable housing particularly important in meeting housing needs. The SHMA seeks to address the key relationships between incomes and housing costs as well as demographic trends, voluntary sharing and tackling unmet need to 2036. Of the overall average annual housing requirement, it suggests that approximately 25,600 should be affordable (see paragraph 3.44, above). However, when setting an affordable housing target account must also be taken of the deliverability of these homes. Affordable housing funding over the full term of this Plan is not known. Based on the funding that was available and the record of delivery of affordable homes over recent years, the housing need requirement and taking into account the housing supply target, an average of 17,000 additional affordable homes per annum has been set as the strategic target for the term of the Plan. This will be monitored closely, especially in light of changing economic conditions and its adoption will not compromise delivery of a higher number.

3.65 Derivation of separate targets for social/ affordable rented and intermediate housing has been informed by the SHMA and other relevant factors including the role intermediate housing can play in helping Londoners get a first step on the housing ladder, reducing the call on social/affordable rented housing, freeing up social/affordable rented homes, providing wider housing choices and securing a

94 Mayor of London. SHMA. 2014. op cit

need for affordable housing to be integrated with the rest of the development and have the same external appearance as other housing.

POLICY 3.13 AFFORDABLE HOUSING THRESHOLDS

Planning decisions and LDF preparation

- A Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes, applying the density guidance set out in Policy 3.4 of this Plan and Table 3.2.
- B Boroughs are encouraged to seek a lower threshold through the LDF process where this can be justified in accordance with guidance, including circumstances where this will enable proposals for larger dwellings in terms of floorspace to make an equitable contribution to affordable housing provision.

- 3.77 Small developments make an important contribution to housing provision in London and must continue to help meet London's need for affordable as well as market housing. Affordable housing policy requirements should be applied across all the provision arising from sites which have the capacity to provide 10 or more homes. Boroughs are encouraged to set a lower threshold where appropriate in light of their local circumstances¹⁰⁰. The capacity of sites should be assessed on the basis of Policy 3.4.
- 3.78 Affordable housing policy should be implemented in circumstances where application of Policy 3.4 to a site or other development opportunity would normally provide capacity for 10 or more homes but a proposal, such as one for larger homes, reduces this output below the affordable housing requirement threshold. Boroughs should ensure that such proposals make an equitable contribution to meeting affordable housing needs by applying affordable housing policy to all the capacity in terms of units which might normally be expected to come forward from the site through application of Policy 3.4. In this process boroughs may wish to draw on the space standards set out in Policy 3.5 and further detail in the Housing SPG. Guidance on affordable housing requirements in connection with provision for older Londoners and student accommodation is included in paragraphs 3.51 and 3.52-3.53B of this Plan.

¹⁰⁰ Thresholds for application of application of affordable housing requirements. GLA and GOL, 2003

impacts and saturation of night time economy activities in an area. When addressing saturation, licensing-based policies can be used to form part of an integrated package of measures, and should be reviewed regularly¹⁴⁵. When managing cumulative impact, boroughs are encouraged to include policies in LDFs to influence the scale and nature of night time economy development, regarding the use class, time of operation, size of premises and proportions of retail frontages in different night time economy areas.

POLICY 4.7 RETAIL AND TOWN CENTRE DEVELOPMENT

Strategic

- A The Mayor supports a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres (see Policy 2.15).

Planning decisions

- B In taking planning decisions on proposed retail and town centre development, the following principles should be applied:
- a the scale of retail, commercial, culture and leisure development should be related to the size, role and function of a town centre and its catchment
 - b retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport
 - c proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact.

LDF preparation

- C In preparing LDFs, boroughs should:
- a identify future levels of retail and other commercial floorspace need (or where appropriate consolidation of surplus floorspace – see Policy 2.15) in light of integrated strategic and local assessments
 - b undertake regular town centre health checks to inform strategic and local policy and implementation
 - c take a proactive partnership approach to identify capacity and bring forward development within or, where appropriate, on the edge of town centres
 - d firmly resist inappropriate out of centre development
 - e manage existing out of centre retail and leisure development in line with the sequential approach, seeking to reduce car dependency,

¹⁴⁵ Department for Culture, Media and Sport. Revised Guidance Issued under section 182 of the Licensing Act 2003. DCMS, 2007 (paragraph 13.31)

improve public transport, cycling and walking access and promote more sustainable forms of development.

- 4.38 Local circumstances will determine whether night time economy activities should be encouraged to develop in a specific zone, or be spread more widely. In large centres the development of a night time economy 'quarter' or zone may be more appropriate for management purposes and enable an appropriate mix of uses to be encouraged¹⁴⁶.
- 4.39 Boroughs should encourage a diverse range of night time activities, expanding culture and leisure venues other than eating and drinking. This diversification can enable a mix of activities in the public realm and help keep public spaces safe. It can also attract a wider range of visitors to town centres at night, including those who feel excluded from alcohol-driven entertainment activities. This is particularly important to outer London, where there is a deficiency in access to other leisure facilities such as cinemas.
- 4.40 At a time of significant change in London's economy, demography, consumer behaviour and retailing there are inevitably uncertainties in projecting future consumer expenditure and shopping floorspace requirements. However, underlying these must be recognition of the pressures for structural change in retailing, the way these may be expressed through demand for, and use of floorspace and the probability of a long term contraction in floorspace growth relative to that which was anticipated in the past (see Policy 2.15). Thus, Experian¹⁴⁷ suggests that London's long term household expenditure could rise from £124 billion in 2011 to over £234 billion by 2036. London household expenditure on comparison goods retail is projected to rise from £23 billion in 2011 to over £48 billion by 2036, an annual average growth rate of 3.0 per cent. However, taking account of growth in commuter and tourist spending, retailers making more efficient use of existing space and special forms of retailing like e-tailing, it is estimated that London could have a baseline need for an additional 0.9 - 2.2 million sq.m of comparison goods retail floorspace by 2036¹⁴⁸. When schemes in the planning pipeline are factored into the analysis, London could need an additional 0.4 - 1.6 million sq.m of comparison goods retail floorspace by 2036.
- 4.41 About one third of the gross baseline-need for additional comparison goods retail floorspace is in outer London and 45 per cent is in the CAZ. Guidance on the more local distribution of these requirements will be set out in supplementary guidance on town centres.
- 4.42 London's household expenditure on convenience goods retail is expected to

146 Mayor of London. Town Centres SPG, 2014 op cit

147 Experian Business Strategies. Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, GLA 2013

148 Experian Business Strategies 2013 op cit. The estimates are based on a central assumption of floorspace productivity growth of 1.9% per annum. The upper figure in each range is the gross total requirement, the lower figure in each range is the net requirement after factoring in vacant floorspace

regarding how the Mayor expects London to achieve this strategic target is outlined in the Mayor's Climate Change Mitigation and Energy Strategy.

POLICY 5.2 MINIMISING CARBON DIOXIDE EMISSIONS

Planning decisions

- A Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- 1 Be lean: use less energy
 - 2 Be clean: supply energy efficiently
 - 3 Be green: use renewable energy
- B The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.

Residential buildings:

Year	Improvement on 2010 Building Regulations
2010 – 2013	25 per cent (Code for Sustainable Homes level 4)t
2013 – 2016	40 per cent
2016 – 2031	Zero Carbon

Non-domestic buildings:

Year	Improvement on 2010 Building Regulations
2010 – 2013	25 per cent
2013 – 2016	40 per cent
2016 – 2019	As per building regulations requirements
2019 - 2031	Zero Carbon

- C Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.
- D As a minimum, energy assessments should include the following details:
 - a calculation of the energy demand and carbon dioxide emissions covered by Building Regulations and, separately, the energy demand and carbon dioxide emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (see paragraph 5.22) at each stage of the energy hierarchy
 - b proposals to reduce carbon dioxide emissions through the energy efficient design of the site, buildings and services
 - c proposals to further reduce carbon dioxide emissions through the use of decentralised energy where feasible, such as district heating and cooling and combined heat and power (CHP)
 - d proposals to further reduce carbon dioxide emissions through the use of on-site renewable energy technologies.
- E The carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.

- 5.16 Carbon dioxide emissions from new development should be reduced by sustainable use of energy in accordance with the Mayor's energy hierarchy. The first step in the hierarchy, to reduce energy demand, should be met through adopting sustainable design principles outlined in Policy 5.3. The second step, to supply energy efficiently, should be met by prioritising decentralised energy, as outlined in Policies 5.5 and 5.6. The third step, to use renewable energy, is outlined in Policy 5.7.
- 5.17 Over time both the Mayor and the Government expect all new development will be zero carbon. The Government has expressed the aim that all new homes should be zero carbon by 2016 and new non-domestic buildings should be zero carbon by 2019. This will result in a significant step change in the national Building Regulations (Part L) in terms of the minimum improvements over the Target Emission Rate (TER)¹⁶⁸ for new development.
- 5.18 The targets set out in Policy 5.2 are minimum improvements over the TER for London as advances are made towards zero carbon development. This approach conforms to the Government's Code for Sustainable Homes (CSH), which outlines

¹⁶⁸ TER is the calculated target carbon dioxide emission rate for a development, expressed in kilograms of carbon dioxide per annum

equipment, building controls and good management practices, including green leases.

- 5.22a Demand side management is a further way developments can minimise their carbon dioxide emissions as well as minimise the need for additional generating and distribution infrastructure. Demand side management enables non-essential equipment to be turned off or to operate at a lower capacity to respond to the wider availability of energy in the network – that is, the wider energy demand and generation across the network. Developments are encouraged to include infrastructure to enable demand side management.
- 5.23 Where it is demonstrated that the specific targets for carbon dioxide emissions reduction cannot be fully achieved on-site the shortfall may be provided off-site, but only in cases where there is an alternative proposal identified and delivery is certain, or where funding can be pooled to support specific carbon dioxide reduction projects or programmes. Further guidance on the criteria for off-site provision, the types of acceptable projects and programmes and a London wide funding scheme will be set out for boroughs.

POLICY 5.3 SUSTAINABLE DESIGN AND CONSTRUCTION

Strategic

- A The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

Planning decisions

- B Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- C Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:
- a minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)
 - b avoiding internal overheating and contributing to the urban heat island effect
 - c efficient use of natural resources (including water), including making the most of natural systems both within and around buildings

- d minimising pollution (including noise, air and urban runoff)
- e minimising the generation of waste and maximising reuse or recycling
- f avoiding impacts from natural hazards (including flooding)
- g ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions
- h securing sustainable procurement of materials, using local supplies where feasible, and
- i promoting and protecting biodiversity and green infrastructure.

LDF preparation

- D Within LDFs boroughs should consider the need to develop more detailed policies and proposals based on the sustainable design principles outlined above and those which are outlined in the Mayor's supplementary planning guidance that are specific to their local circumstances.

- 5.24 The principles underlying sustainable design and construction reflect a number of policies in this Plan. In particular they seek to improve the environmental performance of buildings, including consideration of climate change mitigation and adaptation. Policy 5.3 is intended to ensure that buildings minimise carbon dioxide emissions; are efficient in resource use; protect the environment; recognise the uniqueness of locations; are healthy and adaptable; and make the most of natural systems including, for example, the use of passive solar design or local ecosystems. It should be considered alongside policies dealing with architecture and design in Chapter 7.
- 5.25 Design features such as green roofs (see Policy 5.11) can enhance biodiversity, absorb rainfall, improve the performance of the building, reduce the urban heat island effect and improve the appearance of a development. Use of appropriate materials is also key, and where practicable those with a high embodied energy (see glossary) should be avoided. The Mayor's supplementary planning guidance on Sustainable Design and Construction and on Housing reflect key sustainable design principles and outline the standards that are applicable to all developments. These standards should be considered early in the design process and should be addressed in the design and access statement to show how they have been integrated into the development proposal.
- 5.27 In support of the London Housing Strategy the Mayor has produced a *Housing Design Guide*¹⁷⁰ (see Chapter 3), which provides further guidance on the standards outlined in the Mayor's Housing Supplementary Planning Guidance.
- 5.28 Sustainable construction is also a key consideration. The Mayor's supplementary planning guidance on Sustainable Design and Construction outlines key principles

170 Mayor of London. London Housing Design Guide. (LHDG). LDA, 2010 - this has been replaced by the 2016 Housing SPG.

Research undertaken in Manchester has shown that increasing urban green space by 10 per cent can help to cool high density areas of the city by around three to four degrees centigrade¹⁸⁰. Urban greening also contributes to achieving a network of green multifunctional infrastructure across London with the consequent range of benefits that this can bring (see Policy 2.18).

POLICY 5.11 GREEN ROOFS AND DEVELOPMENT SITE ENVIRONS

Planning decisions

- A Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many of the following objectives as possible:
- a adaptation to climate change (ie aiding cooling)
 - b sustainable urban drainage
 - c mitigation of climate change (ie aiding energy efficiency)
 - d enhancement of biodiversity
 - e accessible roof space
 - f improvements to appearance and resilience of the building
 - g growing food.

LDF preparation

- B Within LDFs boroughs may wish to develop more detailed policies and proposals to support the development of green roofs and the greening of development sites. Boroughs should also promote the use of green roofs in smaller developments, renovations and extensions where feasible.

- 5.52 Green roofs are an essential sustainable design consideration and can take many forms in order to maximise their benefits in a given location. However, the design and operational needs of a green roof should not place undue stress on water supply and other natural resources. Vegetated roofs, including terraces and gardens, can improve the thermal performance of the building, reduce the urban heat island effect, support sustainable urban drainage by absorbing rainfall to reduce flooding, enhance biodiversity, provide amenity for residents who may not have access to private gardens, provide opportunities to grow food and improve appearance.
- 5.53 High quality designs for green walls incorporating vegetation over a majority of a building's vertical surfaces should also be considered in new developments. The Mayor's supplementary guidance on Sustainable Design and Construction contains further guidance on including green space in development proposals.

180 Climate Change and Cities: the Role of Green Infrastructure. Built Environment: Volume 33, Issue 1, 2007

- 5.54 Proper consideration of flood risk is vital to ensuring that London is and continues to be a sustainable city. Approximately 15 per cent of London is already within a recognised flood risk zone from either tidal or fluvial flooding. The Regional Flood Risk Appraisal (RFRA) produced alongside this Plan, investigates flood risk in more detail and identifies that London is at risk from tidal, fluvial, surface water, sewer, groundwater (see Glossary) and reservoir flooding as sources of flooding. It includes recommendations that will be reported against in the Annual Monitoring Report.
- 5.55 The Government has endorsed the Environment Agency's Thames Estuary 2100 (TE2100) Plan, which sets out recommendations for tidal flood risk management for London and the Thames Estuary up to 2100. TE2100 recommends continued maintenance, refurbishment and improvements to the current defences, with some raising of river walls. This should continue to provide London with a high standard of protection from tidal floods. TE2100 estimates that the arrangements for major changes to London's flood defences must be in place by 2070. In order to leave room to raise river walls in a sustainable and cost effective way, some land may have to be safeguarded, and development may need to be set back along the Thames through London. If land is not available, the walls will reduce views across the river and they will be much more expensive to build. There also remains a level of risk, equivalent to 0.1 per cent chance per year – a low risk but not one that could never happen. This means it is still vital at the planning and design stage to consider what would happen to buildings if such a flood were to occur.
- 5.56 Fluvial flood risk is likely to increase significantly through the century, as a result of climate change. Predictions of increases in peak flows of up to 40 per cent would mean that we would have to expect increased flood risk on all of London's tributary rivers. The Environment Agency has produced Catchment Flood Management Plans that examine the nature of flood risk and the approaches available to manage it. These reinforce the need to follow the approach of steering development to places with lower flooding risk and that new development and redevelopment can often provide a means of reducing flood risk for example by providing flood storage/conveyance or setting development back from rivers.

POLICY 5.13 SUSTAINABLE DRAINAGE

Planning decisions

- A Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:
- 1 store rainwater for later use
 - 2 use infiltration techniques, such as porous surfaces in non-clay areas
 - 3 attenuate rainwater in ponds or open water features for gradual
-

release

- 4 attenuate rainwater by storing in tanks or sealed water features for gradual release
- 5 discharge rainwater direct to a watercourse
- 6 discharge rainwater to a surface water sewer/drain
- 7 discharge rainwater to the combined sewer.

Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.

LDF preparation

- B Within LDFs boroughs should, in line with the Flood and Water Management Act 2010, utilise Surface Water Management Plans to identify areas where there are particular surface water management issues and develop actions and policy approaches aimed at reducing these risks.

- 5.57 There will also be increased surface water flood risk, with the likelihood of more intense storms. The Flood and Water Management Act 2010 gives London boroughs clearer responsibilities related to surface water flood risk. Implementation mechanisms including the national Sustainable Drainage Systems Standards are emerging. Moreover, the Drain London Forum brings together the key agencies involved in managing London's drainage system and has delivered draft Surface Water Management Plans for every London borough. As the RFRA illustrates, it has also made significant progress in the understanding of surface water flood risk. In the meantime, the now well established sustainable drainage hierarchy contained within Policy 5.13 will lead to a steady reduction in the overall amount of rainfall being discharged to the drainage system. The sustainable drainage hierarchy in policy 5.13A is intended to ensure that all practical and reasonable measures are taken to manage surface water higher up the hierarchy (1 being the highest) and that the amount of surface water managed at the bottom of the hierarchy, is minimised. The hierarchy is designed to apply across the whole of London. In addition, green roofs (see Policy 5.11) can also make a contribution to sustainable urban drainage by absorbing a proportion of surface water and therefore reducing rates of water flow. Implementing such measures will not only reduce run-off but provide multiple benefits to London amenity, biodiversity and better water quality to name but three. Changes to the General Permitted Development Order 2008 restricting permitted development rights for impermeable surfaces within the curtilage of dwelling houses should also contribute to a reduction of surface water run-off.

transport policies and strategies.

- 6.5 This chapter sets out policies to support integration of transport and development, connecting London and ensuring better streets. It also sets out car and cycle parking standards.

Integrating transport and development

POLICY 6.1 STRATEGIC APPROACH

Strategic

- A The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in Table 6.1 and by:
- a encouraging patterns and nodes of development that reduce the need to travel, especially by car – boroughs should use the standards set out in Table 6.2 in the Parking Addendum to this chapter to set maximum car parking standards in DPDs
 - b seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand – boroughs should use the standards set out in Table 6.3 in the Parking Addendum to set minimum cycle parking standards in DPDs
 - c supporting development that generates high levels of trips at locations with high levels of public transport accessibility and/or capacity, either currently or via committed, funded improvements including, where appropriate, those provided by developers through the use of planning obligations (See Policy 8.2).
 - d improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London (see Policy 2.3)
 - e seeking to increase the use of the Blue Ribbon Network, especially the Thames, for passenger and freight use
 - f facilitating the efficient distribution of freight whilst minimising its impacts on the transport network
 - g supporting measures that encourage shifts to more sustainable modes and appropriate demand management
 - h promoting greater use of low carbon technology so that carbon dioxide and other contributors to global warming are reduced
 - i promoting walking by ensuring an improved urban realm
 - j seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and

practicable.

- B The Mayor will, and boroughs should, take an approach to the management of streetspace that takes account of the different roles of roads for neighbourhoods and road users in ways that support the policies in this Plan promoting public transport and other sustainable means of transport (including policies 6.2, 6.7, 6.9 and 6.10) and a high quality public realm. Where appropriate, a corridor-based approach should be taken to ensure the needs of street users and improvements to the public realm are co-ordinated.

- 6.6 The Mayor recognises the need, when planning for where people will live, work, study and pursue leisure activities, to improve movement between these places in an integrated way, emphasising the quality of the public realm, and the safety and comfort of travellers. A similar approach should be taken when planning the location of businesses, taking account of the ways they receive the goods and services they need, and how conveniently they then serve their customers. For a range of policy reasons, the best option is to reduce the distances involved, in turn reducing the need for the transport system to accommodate unnecessary travel demands: this principle underlies many of the spatial proposals set out in Chapter Two (particularly, perhaps, as regards Outer London). However, this is not always possible in a complex urban environment like London's, with its specialist clusters of economic, social, educational and leisure activities and its unique place in the wider south east of England. Moreover even with greater locational efficiencies, consideration has to be given to providing additional transport capacity needed to support London's growth, and to ensuring that the most is made of existing transport infrastructure by smoothing traffic flows and travel planning.
- 6.7 This close co-ordination of land use and transport planning is crucial to effective and sustainable spatial development and is supported by the approach taken by the Government in the NPPF. This states that planning has a key role in delivering the Government's integrated transport strategy. Shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, can help reduce the need to travel and the length of journeys, and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking, and cycling.
-

POLICY 6.8 COACHES**Strategic**

- A The Mayor will work with all relevant partners to investigate the feasibility of developing a series of coach hubs or the potential for alternative locations for coach station facilities to provide easier access to the coach network, while retaining good access to central London for coach operators.

- 6.32 The Mayor will investigate the feasibility of developing a series of coach hubs to reduce the impact in and around Victoria and reduce the distances people need to travel to change to and from the coach.

POLICY 6.9 CYCLING**Strategic**

- A The Mayor will work with all relevant partners to bring about a significant increase in cycling in London, so that it accounts for at least 5 per cent of modal share by 2026. He will:
- a identify, promote and implement a network of cycle routes across London which will include Cycle Superhighways and Quietways
 - b continue to operate and improve the cycle hire scheme
 - c fund the transformation of up to four outer London borough town centres into cycle friendly 'mini-Hollands'.

Planning decisions

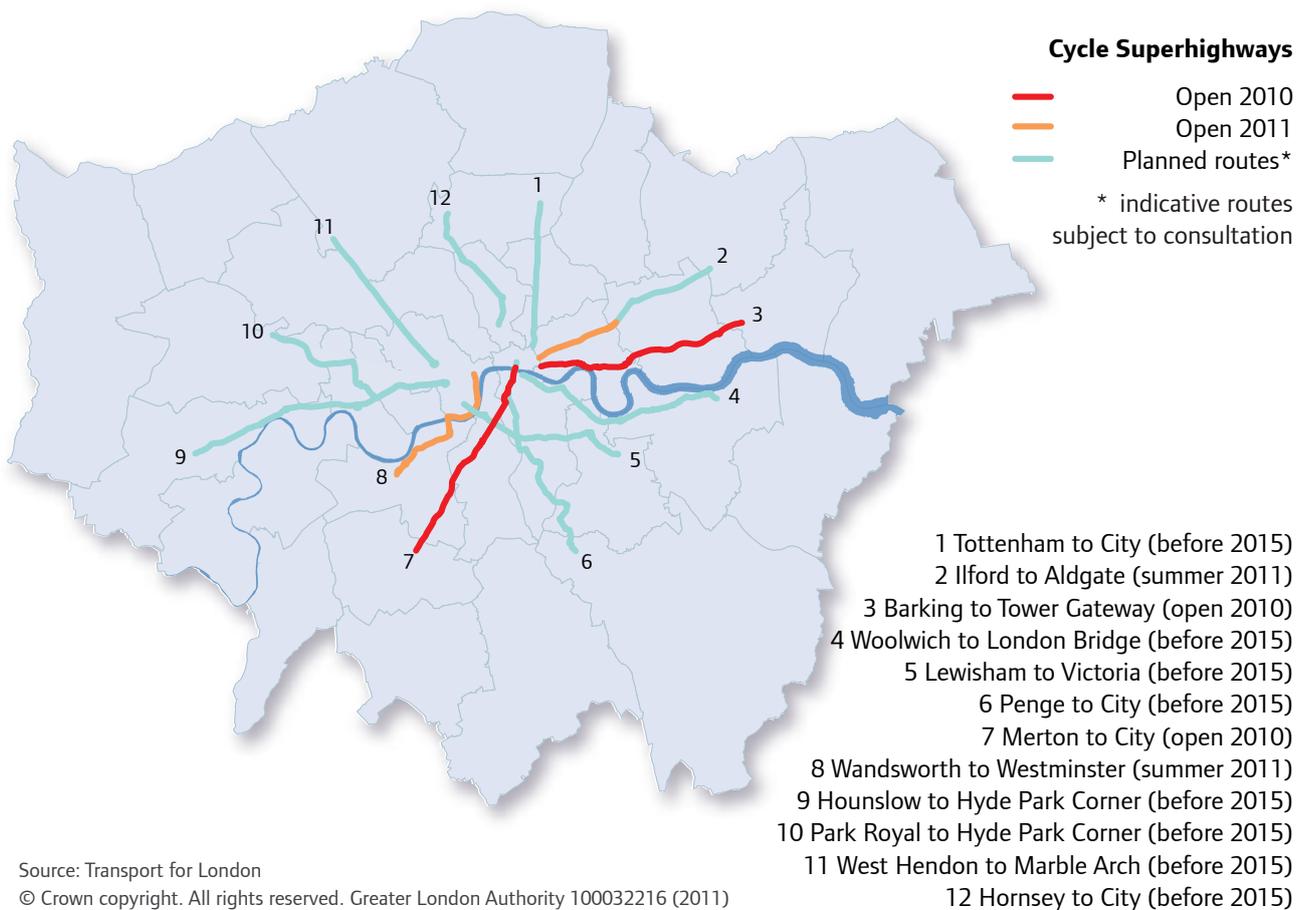
- B Developments should:
- a provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards (or subsequent revisions)
 - b provide on-site changing facilities and showers for cyclists
 - c contribute positively to an integrated cycling network for London by providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable and in line with the guidance set out in the London Cycle Design Standards (or subsequent revisions)
 - d provide links to existing and planned cycle infrastructure projects including Cycle Superhighways, Quietways, the Central London Grid and the 'mini-Hollands'
 - e facilitate the Mayor's cycle hire scheme through provision of land and/or planning obligations where relevant, to ensure the provision of sufficient capacity.

LDF preparation

C DPDs should:

- a identify, promote and facilitate the completion of relevant sections of cycle routes including Cycle Superhighways, Quietways and the Central London Grid and local borough routes, in light of guidance from TfL
- b identify and safeguard sites for new or expanded cycle docking stations to increase capacity of the Mayor’s cycle hire scheme in areas of high usage or operational stress
- c identify and implement safe and convenient direct cycle routes to town centres, transport nodes and other key uses such as schools
- d implement secure cycle parking facilities in line with the minimum standards set out in Table 6.3 or implement their own cycle parking standards to provide higher levels of provision.

Map 6.2 Cycle superhighways



Source: Transport for London
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(Routes illustrated are currently under review and subject to change in line with the Mayor’s Vision for Cycling. Timescales will be updated in the next iteration of the Plan)

chosen, it should allow for parking on either side, as this provides additional capacity. TfL intend to publish a compendium of good practice on cycle parking. Cycle hire docking stations should not be considered a substitute for cycle parking facilities.

POLICY 6.10 WALKING

Strategic

- A The Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasizing the quality of the pedestrian and street environment, including the use of shared space principles, – promoting simplified streetscape, decluttering and access for all.

Planning decisions

- B Development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space by referring to Transport for London's Pedestrian Design Guidance.

LDF preparation

- C DPDs should:
- a maintain and promote the relevant sections of the Walk London Network shown on Map 6.3, as well as borough routes
 - b identify and implement accessible, safe and convenient direct routes to town centres, transport nodes and other key uses
 - c promote the 'Legible London' programme to improve pedestrian wayfinding
 - d provide for the undertaking of audits to ensure that the existing pedestrian infrastructure is suitable for its proposed use and that new development improves pedestrian amenity
 - e encourage a higher quality pedestrian and street environment, including the use of shared space principles, such as simplified streetscape, decluttering, and access for all.

- 6.37 The Mayor is also committed to a substantial increase in walking in London. To this end, the quality and safety of London's pedestrian environment should be improved to make the experience of walking more pleasant and an increasingly viable alternative to the private car (see also policies on inclusive environments (7.2) and the public realm (7.5)). By providing safe and attractive routes that are easy to navigate, people will be encouraged to walk more, which will have safety, economic and health benefits for them and also help tackle climate change and

POLICY 6.13 PARKING**Strategic**

- A The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- B The Mayor supports Park and Ride schemes in outer London where it can be demonstrated they will lead to overall reductions in congestion, journey times and vehicle kilometres.

Planning decisions

- C The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be the basis for considering planning applications (also see Policy 2.8), informed by policy and guidance below on their application for housing in parts of Outer London with low public transport accessibility (generally PTALs 0-1).
- D In addition, developments in all parts of London must:
 - a ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
 - b provide parking for disabled people in line with Table 6.2
 - c meet the minimum cycle parking standards set out in Table 6.3
 - d provide for the needs of businesses for delivery and servicing.

LDF preparation

- E
 - a the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in DPDs.
 - b in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people)
 - c in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole
 - d outer London boroughs wishing to promote a more generous standard for office developments would need to take into account in a DPD
 - a regeneration need
 - no significant adverse impact on congestion or air quality
 - a lack (now and in future) of public transport
 - a lack of existing on or off street parking

- a commitment to provide space for electric and car club vehicles, bicycles and parking for disabled people above the minimum thresholds
- a requirement, via Travel Plans, to reduce provision over time.
- e Outer London boroughs should demonstrate that they have actively considered more generous standards for housing development in areas with low public transport accessibility (generally PTALs 0-1) and take into account current and projected pressures for on-street parking and their bearing on all road users, as well as the criteria set out in NPPF (Para 39).

6.42 Parking policy, whether in terms of levels of provision or regulation of on- or off-street parking, can have significant effects in influencing transport choices and addressing congestion. It can also affect patterns of development and play an important part in the economic success and liveability of places, particularly town centres (see Policy 2.8 for further detail on the outer London economy). The Mayor considers it is right to set car parking standards in the Plan given his direct operational responsibility for elements of London's road network, and the strategic planning importance of ensuring London's scarce resources of space are used efficiently. Boroughs wishing to develop their own standards should take the standards in this Plan as their policy context. But he also recognises that London is a diverse city that requires a flexible approach to identifying appropriate levels of car parking provision across boundaries. This means ensuring a level of accessibility by private car consistent with the overall balance of the transport system at the local level; for further advice refer to the Housing SPG. In line with the Duty to Cooperate boroughs adjoining other regions must also liaise with the relevant authorities to ensure a consistent approach to the level of parking provision. Transport assessments and travel plans for major developments should give details of proposed measures to improve non-car based access, reduce parking and mitigate adverse transport impacts. They will be a key factor in helping boroughs assess development proposals and resultant levels of car parking.

6.42i In developing their residential parking standards in the context of London Plan policy, outer London boroughs should take account of residents' dependency on the car in areas with low public transport accessibility (generally PTALs 0-1). Where appropriate in these locations Boroughs should consider revised standards (which could include minima) and permitting higher levels of provision there than is indicated in Table 6.2, particularly to avoid generating unacceptable pressure for on-street parking. This may be especially important in 'suburban' areas and for areas with family housing.

6.42j In outer London a more flexible approach for applications may also be acceptable in some limited parts of areas within PTAL 2, in locations where the orientation or levels of public transport mean that a development is particularly dependent on car travel. In doing so, authorities should take account of the criteria set out in paragraph 39 of the NPPF. Further advice is provided in the draft Housing SPG and

POLICY 7.7 LOCATION AND DESIGN OF TALL AND LARGE BUILDINGS**Strategic**

- A Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.

Planning decisions

- B Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria below. This is particularly important if the site is not identified as a location for tall or large buildings in the borough's LDF.
- C Tall and large buildings should:
- a generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport
 - b only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building
 - c relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
 - d individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London
 - e incorporate the highest standards of architecture and materials, including sustainable design and construction practices
 - f have ground floor activities that provide a positive relationship to the surrounding streets
 - g contribute to improving the permeability of the site and wider area, where possible
 - h incorporate publicly accessible areas on the upper floors, where appropriate
 - i make a significant contribution to local regeneration.
- D Tall buildings:
- a should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference
 - b should not impact on local or strategic views adversely
- E The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and

gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.

LDF preparation

E Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks. These areas should be consistent with the criteria above and the place shaping and heritage policies of this Plan.

- 7.25 Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline²²⁶ or are larger than the threshold sizes set for the referral of planning applications to the Mayor. Whilst high density does not need to imply high rise, tall and large buildings can form part of a strategic approach to meeting the regeneration and economic development goals laid out in the London Plan, particularly in order to make optimal use of the capacity of sites with high levels of public transport accessibility. However, they can also have a significant detrimental impact on local character. Therefore, they should be resisted in areas that will be particularly sensitive to their impacts and only be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations, are able to enhance the qualities of their immediate and wider settings, or if they make a significant contribution to local regeneration.
- 7.26 Tall and large buildings should always be of the highest architectural quality, (especially prominent features such as roof tops for tall buildings) and should not have a negative impact on the amenity of surrounding uses. Opportunities to offer improved permeability of the site and wider area should be maximised where possible.
- 7.27 The location of a tall or large building, its alignment, spacing, height, bulk, massing and design quality should identify with and emphasise a point of civic or visual significance over the whole area from which it will be visible. Ideally, tall buildings should form part of a cohesive building group that enhances the skyline and improves the legibility of the area, ensuring tall and large buildings are attractive city elements that contribute positively to the image and built environment of London.
- 7.28 The Mayor will work with boroughs to identify locations where tall and large buildings might be appropriate, sensitive or inappropriate. He will help them develop local strategies to help ensure these buildings are delivered in ways that maximise their benefits and minimise negative impacts locally and across borough

²²⁶Commission for Architecture and the Built Environment (CABE) and English Heritage. Guidance on Tall Buildings. CABE, July 2007

boundaries as appropriate. It is intended that Mayoral supplementary guidance on characterisation could help set the context for this. In balancing these impacts, unacceptable harm may include criteria in parts D and E of Policy 7.7. Opportunity area planning frameworks can provide a useful opportunity for carrying out such joint work.

Historic environment and landscapes

POLICY 7.8 HERITAGE ASSETS AND ARCHAEOLOGY

Strategic

- A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

- C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

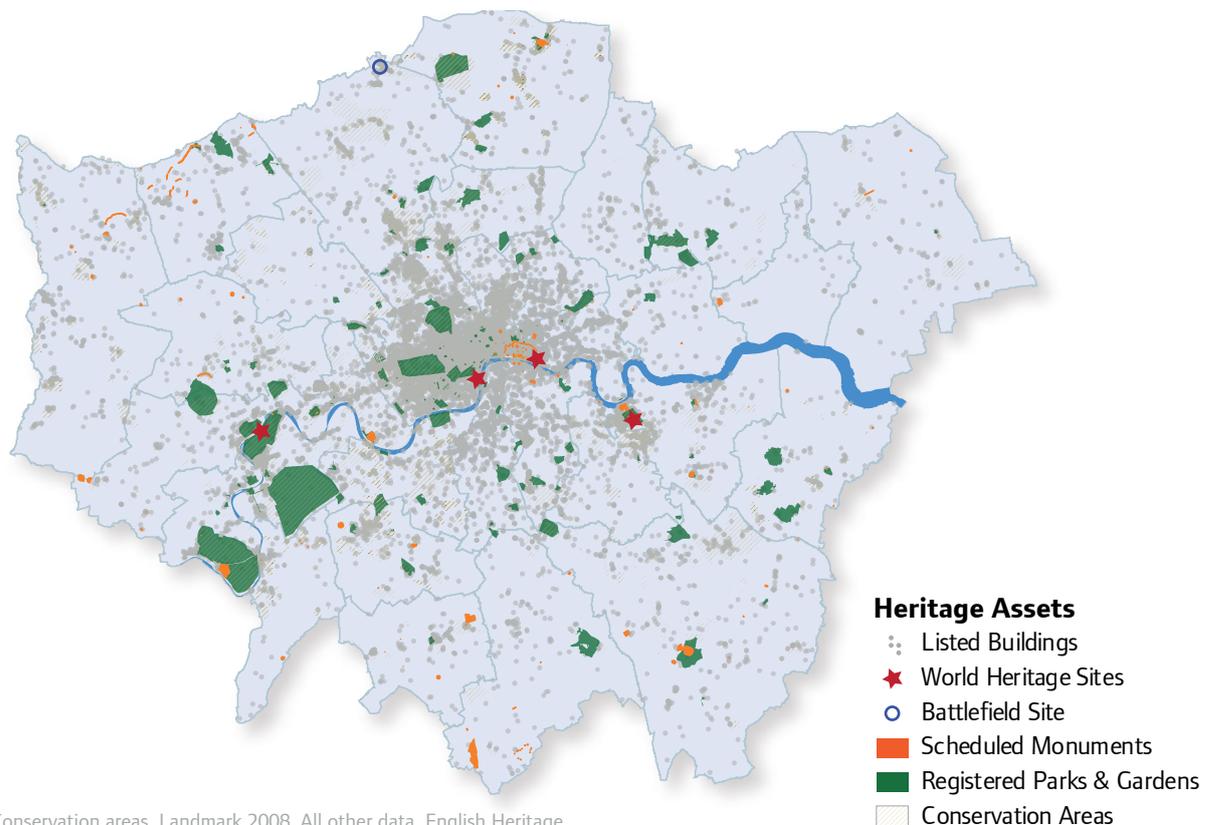
LDF preparation

- F Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.
- G Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and

improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

7.29 London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. Natural landscapes can help to provide a unique sense of place²²⁷ whilst layers of architectural history provide an environment that is of local, national and world heritage value. It is to London's benefit that some of the best examples of architecture from the past 2000 years sit side by side to provide a rich texture that makes the city a delight to live, visit, study and do business in. Ensuring the identification and sensitive management of London's heritage assets in tandem with promotion of the highest standards of modern architecture will be key to maintaining the blend of old and new that gives the capital its unique character. Identification and recording heritage through, for example, character appraisals, conservation plans and local lists, which form the Greater London Historic Environmental Record (GLHER) are essential to this process²²⁸.

Map 7.1 Spatial distribution of designated heritage assets



Source: Conservation areas, Landmark 2008. All other data, English Heritage
© Crown Copyright and database right 2013. Ordnance Survey 100032216 GLA.

227 Natural England London's Natural Signatures, The London Landscape Framework. Prepared for Natural England by Alan Baxter and Shiels Flynn January 2011

228 English Heritage. Conservation Principles, policies and guidance. English Heritage, April 2008

- 7.32 London's heritage assets and historic environment also make a significant contribution to the city's culture by providing easy access to the history of the city and its places. For example recognition and enhancement of the multicultural nature of much of London's heritage can help to promote community cohesion. In addition to buildings, people can perceive the story of the city through plaques, monuments, museums, artefacts, photography and literature. Every opportunity to bring the story of London to people and ensure the accessibility and good maintenance of London's heritage should be exploited. In particular, where new development uncovers an archaeological site or memorial, these should be preserved and managed on-site. Where this is not possible provision should be made for the investigation, understanding, dissemination and archiving of that asset.

POLICY 7.9 HERITAGE-LED REGENERATION

Strategic

- A Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.

Planning decisions

- B The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

LDF Preparation

- C Boroughs should support the principles of heritage-led regeneration in LDF policies

- 7.33 Based on an understanding of the value and significance of heritage assets, the sensitive and innovative use of historic assets within local regeneration should be encouraged. Schemes like Townscape Heritage Initiatives, Heritage Lottery Fund, Heritage Economic Regeneration Schemes or Buildings at Risk Grants can play an important role in fostering regeneration of historic areas while also promoting the maintenance and management of heritage assets and developing community appreciation of them.
-

New development should incorporate elements that deter terrorists, maximise the probability of detecting intrusion, and delay any attempts at disruption until a response can be activated (see also Policy 7.3 on designing out crime). Consideration should be given to physical and electronic security (including detailed questions of design and choice of material, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police should be consulted to ensure major projects contain appropriate design solutions, which respond to the potential level of risk whilst ensuring the quality of places is maximised.

Air and noise pollution

POLICY 7.14 IMPROVING AIR QUALITY

Strategic

- A The Mayor recognises the importance of tackling air pollution and improving air quality to London's development and the health and well-being of its people. He will work with strategic partners to ensure that the spatial, climate change, transport and design policies of this plan support implementation of his Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimize public exposure to pollution.

Planning decisions

- B Development proposals should:
- a minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3)
 - b promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following the best practice guidance in the GLA and London Councils' 'The control of dust and emissions from construction and demolition'
 - c be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).
 - d ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, and that it is possible to put in place measures having clearly demonstrated equivalent air quality benefits, planning obligations or planning conditions should be used as appropriate to ensure

this, whether on a scheme by scheme basis or through joint area-based approaches

- e where the development requires a detailed air quality assessment and biomass boilers are included, the assessment should forecast pollutant concentrations. Permission should only be granted if no adverse air quality impacts from the biomass boiler are identified

LDF preparation

C Boroughs should have policies that:

- a seek reductions in levels of pollutants referred to in the Government's National Air Quality Strategy having regard to the Mayor's Air Quality Strategy
- b take account of the findings of their Air Quality Review and Assessments and Action Plans, in particular where Air Quality Management Areas have been designated.

7.47 Poor air quality is a public health issue that is linked to the development of chronic diseases and can increase the risk of respiratory illness. Action is needed to improve air quality in London and the Mayor is committed to working towards meeting the EU limit values of fine particulate matter (PM₁₀) by 2011 and nitrogen dioxide (NO₂) by 2015. The Mayor's Air Quality Strategy sets out policies and proposals to address the full range of these air quality issues reducing emissions from transport, reducing emissions from homes, business and industry and increasing awareness of air quality issues. For example the Low Emission Zone (LEZ) will continue to deliver health benefits by reducing emissions from the oldest heavy diesel engined vehicles. The Strategy also includes proposals to extend the LEZ to heavier vans and mini buses from 2012 and to introduce a new standard for nitrogen oxides (NO_x) in 2015. Other transport policies to contribute to achieving these limit values address:

- Encouraging smarter choices and sustainable travel behaviour
- Promoting technological change and cleaner vehicles
- Reducing emissions from public transport and public transport fleets.

7.48 The London Plan policies specifically address the spatial implications of the Air Quality Strategy and, in particular, how development and land use can help achieve its objectives. In his Air Quality Strategy (December 2010), the Mayor also encourages local authorities to publish supplementary planning documents to ensure that air quality is fully embedded within the planning process. The Mayor will also use the Local Implementation Plan (LIP) process to ensure that air quality improvement measures are included in borough transport plans. The Air Quality Strategy includes a mechanism for boroughs to set appropriate emission reduction targets that will assist in setting out the process where the offsetting of negative air quality impacts from development is required. The detailed air quality

POLICY 7.15 REDUCING AND MANAGING NOISE, IMPROVING AND ENHANCING THE ACOUSTIC ENVIRONMENT AND PROMOTING APPROPRIATE SOUNDSCAPES**Strategic**

- A The transport, spatial and design policies of this plan will be implemented in order to reduce and manage noise to improve health and quality of life and support the objectives of the Mayor's Ambient Noise Strategy.

Planning decisions

- B Development proposals should seek to manage noise by:
- a avoiding significant adverse noise impacts on health and quality of life as a result of new development;
 - b mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses;
 - c improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
 - d separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation;
 - e where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
 - f having particular regard to the impact of aviation noise on noise sensitive development;
 - g promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

LDF preparation

- C Boroughs and others with relevant responsibilities should have policies to:
- a manage the impact of noise through the spatial distribution of noise making and noise sensitive uses;
 - b identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations¹.

¹ <https://consult.defra.gov.uk/comunications/https-consult-defra-gov-ukenvironmentalnoise/>

co-ordination. Cross-borough boundary planning is particularly relevant for the larger metropolitan and regional parks and for facilities such as playing pitches, where a sub-regional approach to planning is recommended.

- 7.58 The value of green infrastructure not designated as local open space is considered to be a material consideration that needs to be taken into account in the planning process. These values are set out in Policy 2.18 on green infrastructure.
- 7.58A Neighbourhoods may identify Local Green Spaces that are important to them, local in character and small-scale. The policy for controlling development on them is Green Belt policy²³⁷, as such Local Green Spaces are not included in Table 7.2 above.

POLICY 7.19 BIODIVERSITY AND ACCESS TO NATURE

Strategic

- A The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.
- B Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1-2.17, 3.1, 3.3, 3.7, 5.4A, 5.14, 5.15, 5.17, 5.20, 6.3, 6.9, 7.14, 7.15, 7.25 – 7.27 and 8.1. Whilst all opportunity and intensification areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.

Planning decisions

- C Development Proposals should:
- a wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity
 - b prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites
 - c not adversely affect the integrity of European sites and be resisted

237 National Planning Policy Framework DCLG March 2012 paras 76-78

where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

- D On Sites of Importance for Nature Conservation development proposals should:
- a give the highest protection to sites with existing or proposed international designations¹ (SACs, SPAs, Ramsar sites) and national designations² (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations³
 - b give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance
 - c give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.
- E When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:
- 1 avoid adverse impact to the biodiversity interest
 - 2 minimize impact and seek mitigation
 - 3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

LDF preparation

- F In their LDFs, Boroughs should:
- a use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.
 - b identify areas deficient in accessible wildlife sites and seek opportunities to address them
 - c include policies and proposals for the protection of protected/ priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets
 - d ensure sites of European or National Nature Conservation

1 Designated under European Union Council Directive on the conservation of wild birds (79/409/EEC) 1992, European Union Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance especially as waterfowl habitat 1971

2 Designated under the Wildlife and Countryside Act 1981 as amended by the Countryside Rights of Way Act 2000

3 Conservation of Species and Habitats Regulations (2010) (as amended)

Importance are clearly identified

- e identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

- 7.59 London contains numerous sites of importance for nature conservation. The Mayor expects London's biodiversity and natural heritage to be conserved and enhanced for the benefit of current and future Londoners. These sites form an integral part of London's green infrastructure and should be linked to other parts of the network to enhance its value. Many of these sites are of international or national importance. Any adverse effects on European sites that are vulnerable will need to be addressed. Natural England will need to be consulted on any application that affects these sites.
- 7.60 The Mayor's Biodiversity Strategy ²³⁸sets out criteria and procedures for identifying land of importance for London's biodiversity for protection in LDFs and identifying areas of deficiency in access to nature. Protecting the sites at all levels, serves to protect the significant areas of Biodiversity Action Plan (BAP) priority habitat in London and most priority species. However, protection of biodiversity outside designated sites will also be needed. The Mayor and the London Biodiversity Partnership have identified targets in Table 7.3 for the re-creation and restoration of priority habitats, as recommended in paragraphs 109, 114, 117 and 118 of the NPPF. Broad areas where habitat restoration and re-creation would be appropriate have been identified for each of the priority habitats. These have been prepared by Greenspace Information for Greater London on behalf of the London Biodiversity Partnership. Priority should be placed on connecting fragmented habitat and increasing the size of habitat areas to increase resilience to climate change.
- 7.61 Development proposals should begin by understanding their wider context and viewing promotion of nature conservation as integral to the scheme not as an 'add-on'. The indirect impacts of development (eg noise, shading, lighting etc) need to be considered alongside direct impacts (eg habitat loss). New development should improve existing or create new habitats or use design (green roofs, living walls) to enhance biodiversity and provide for its on-going management. Most wildlife habitats are difficult to recreate, accordingly the replacement or relocation of species and habitats should only be a last resort. Access to nature can be an important contributor to people's health and the Mayor wants to see better access to both existing and new wildlife habitats and has identified priorities to redress areas of deficiency²³⁹.

238 Mayor of London. The Mayor's Biodiversity Strategy- connecting with Nature. GLA 2005

239 Mayor of London. Improving Londoners' Access to Nature. GLA 2008

about a place, such as cultural, historic or natural elements, should be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.

- 1.2.8 Making the best use of land will allow the city to grow in a way that works for everyone. It will allow more high-quality homes and workspaces to be developed as London grows, while supporting local communities and creating new ones that can flourish in the future.

GG2 Making the best use of land

To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

- A enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites
- B prioritise sites which are well-connected by existing or planned public transport
- C proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling
- D applying a design-led approach to determine the optimum development capacity of sites
- E understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character
- F protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible

- | | |
|---|--|
| G | plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth |
| H | maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance. |

Creating a healthy city

- 1.3.1 The mental and physical health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health.
- 1.3.2 As set out in the Mayor's Health Inequalities Strategy, the scale of London's health inequalities is great and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities. Delivering Good Growth will involve prioritising health in all of London's planning decisions, including through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of development proposals on health and health inequality.
- 1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access and quality varies

community-led housing, and self- and custom-build, will all need to play a role, and more of our new homes will need to be built using precision-manufacturing. Alongside this, there will need to be a greater emphasis on the role councils and housing associations play in building genuinely affordable homes.

- 1.4.7 There are a range of other measures that have an impact on the availability of homes. For example, existing homes must not be left empty, and have the potential to be brought back into use as affordable housing, and boroughs should use all the tools at their disposal to ensure that homes are actually built after planning permissions are granted.
- 1.4.8 Delivering the housing London needs will be a huge challenge that will require everyone involved in the housing market to work together. Along with the London Housing Strategy, this London Plan establishes the framework that will make this possible, helping to make London a city that everyone who wants to can call home.

GG4 Delivering the homes Londoners need

To create a housing market that works better for all Londoners, those involved in planning and development must:

- A ensure that more homes are delivered
- B support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable
- C create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing
- D identify and allocate a range of sites to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset
- E establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes

are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

Growing a good economy

- 1.5.1 London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the Wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself.
- 1.5.2 The things that make London's economy so strong are the same things that make London an attractive and exciting place to live, work and visit. London's ethos of tolerance and respect, its rich cultural and historic assets, the quality of its streets and public places, its spirit of creativity and entrepreneurialism – these things attract businesses of all sizes and allow them to develop and thrive. The people who these businesses employ need strong communities, good public transport connections, pleasant environments that promote good health, access to shops and local services, and good quality, affordable homes in places they want to live. The continuing success of London's economy is reliant upon making the city work better for everyone.
- 1.5.3 Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably-priced, good quality employment space will be needed across London to make this happen.

plan for a more integrated approach to water management, while minimising flood risk.

- 1.6.4 Equally significant in a global city is the threat of terrorism, and new forms of attack require new forms of defence. Large-scale fires also remain a possibility in London. As public places are made safer and existing housing is improved, these threats underline the importance of collaborative planning with London's police forces and public safety experts, the London Fire and Emergency Planning Authority.
- 1.6.5 Careful planning of strategic and local infrastructure in all its forms can make the city smarter, more efficient and more resilient, preparing it for all that the future may bring. This will require collaboration between the infrastructure industry and planning authorities to determine what is needed where in order to plan for London's future, using the framework established by the Mayor's Strategic Infrastructure Investment Plan.
- 1.6.6 Ensuring sufficient housing at the right price is also key to the city's resilience. The shortage of affordable housing in the capital is hindering the recruitment and retention of public service workers, including those crucial to the operation of the emergency services, the health system and London's transport infrastructure.
- 1.6.7 Good planning can make London more resilient against the threats of the modern world, while improving the city's impact on the environment. The approaches set out in this Plan will ensure that London remains a safe and prosperous place to live for many decades to come.

GG6 Increasing efficiency and resilience

To help London become a more efficient and resilient city, those involved in planning and development must:

- A seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050
- B ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts

from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect

C create a safe and secure environment which is resilient the impact of emergencies including fire and terrorism

D take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

- 2.0.6 London's **Central Activities Zone (CAZ) and town centres** are the primary locations for commercial activity in the capital. These are complex parts of London, with a wide mix of uses and unique local character. The CAZ and the town centre network have a crucial role to play in supporting London's growth, and the London Plan sets out how this growth should be managed and planned for. Many town centres and the surrounding areas have potential to accommodate significant quantities of new housing, making the most of walking, cycling and public transport connectivity and complementing their commercial role.
- 2.0.7 Growth and change have not always benefited Londoners equally. In some cases, the wrong sort of growth has led to established communities finding themselves priced out of the area they call home. Some parts of the city have not benefited from the advantages the growth of London provides, with too many areas in London still experiencing deprivation despite the wider success of the capital. To address this, it is important that there is a strong focus on **sustainable and inclusive regeneration** in these areas, with boroughs, the Mayor and other partners working closely with the local community to bring about the right sort of change and investment. Where significant development is planned in these areas, it is crucial that it benefits local communities, provides employment and genuinely affordable housing, and is properly integrated into the area.

Growth Corridors and Opportunity Areas

Policy SD1 Opportunity Areas

- A To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:
- 1) provide support and leadership for the collaborative preparation and implementation of planning frameworks that:
 - a) set out a clear strategy for accommodating growth
 - b) assist in delivering specific infrastructure requirements that unlock capacity for new homes and jobs

- c) support regeneration
 - d) are prepared in an open and timely manner
 - e) encourage the strategic remediation of contaminated land
- 2) bring together the range of investment and intervention needed to deliver the vision and ambition for the area
 - 3) support and implement adopted planning frameworks, in order to give them appropriate material weight in planning decisions
 - 4) ensure that his agencies (including Transport for London) work together and with others to promote and champion Opportunity Areas, and identify those that require public investment and intervention to achieve their growth potential
 - 5) ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities
 - 6) ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration
 - 7) monitor progress in delivering homes, jobs and infrastructure, taking action where necessary to overcome any barriers to delivery
 - 8) ensure that development facilitates ambitious transport mode share targets.
- B** Boroughs, through Development Plans and decisions, should:
- 1) clearly set out how they will encourage and deliver the growth potential of Opportunity Areas
 - 2) support development which creates employment opportunities and housing choice for Londoners
 - 3) plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary

- 4) recognise the role of heritage in place-making
- 5) establish the capacity for growth in Opportunity Areas, taking account of the indicative capacity for homes and jobs in Table 2.1
- 6) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution
- 7) include ambitious transport mode share targets
- 8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration
- 9) ensure planning frameworks are informed by public and stakeholder engagement and collaboration at an early stage and throughout their development
- 10) work with the Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas. These should be distinct and significant locations that have capacity for at least 5,000 new jobs and/or 2,500 new homes
- 11) take appropriate measures to deal with contamination that may exist.

2.1.1 **Opportunity Areas** are identified as significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two. When developing policies for Development Plans, allocations and frameworks, boroughs should use the

- 2.6.6 These trends present significant **challenges and opportunities for retailing** in all town centres and associated high streets including adapting to new innovative forms of retailing, accommodating new space where there is identified demand, and managing the transition of surplus retail floorspace to other uses, such as leisure, business, and more intensive forms of mixed-use development that include a residential component, in appropriate locations. Boroughs and other stakeholders will need to proactively manage their town centres to take account of these trends and the impacts on centres of different types and sizes.
- 2.6.7 **Residential development** plays an important role in ensuring town centre vitality, particularly through the delivery of diverse housing. Residential-only schemes in town centres may be appropriate outside the primary shopping area and primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.

Policy SD7 Town centres: development principles and Development Plan Documents

- A When considering development proposals, boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses in accordance with Parts A1 - A3, with limited exceptions for existing viable office locations in outer London (see [Policy E1 Offices](#)). Boroughs should:
- 1) apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out of centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations. Applications that fail the sequential test should be refused

- 2) require an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan. Applications that are likely to have a significant adverse impact should be refused
- 3) realise the full potential of existing out of centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location unless the proposal is in accordance with the Development Plan or can be justified through the sequential test and impact assessment requirements in Parts A(1) and A(2) above.

B Boroughs should support the town centres first approach in their Development Plans by:

- 1) assessing the need for main town centre uses, taking into account capacity and forecast future need
- 2) allocating sites to accommodate identified need within town centres, considering site suitability, availability and viability, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices). If suitable and viable town centre sites are not available, boroughs should allocate appropriate edge-of-centre sites that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport
- 3) reviewing town centre boundaries where necessary
- 4) setting out policies, boundaries and site allocations for future potential town centres to accommodate identified deficiencies in capacity (having regard to Policy SD8 Town centre network and the future potential town centre classifications in Annex 1).

C In Development Plans, boroughs should:

- 1) define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing
- 2) consider the protection of out-of-centre high streets as local parades or business areas and develop appropriate policies to support and enhance the role of these high streets, subject to local evidence, recognising the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment (see [Policy H1 Increasing housing supply](#))
- 3) develop policies through strategic and local partnership approaches ([Policy SD9 Town centres: Local partnerships and implementation](#)) to meet the objectives for town centres set out in [Policy SD6 Town centres and high streets](#) to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network ([Policy SD8 Town centre network](#))
- 4) develop policies for edge of centre areas, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses taking into account local circumstances
- 5) identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1. Criteria to consider in assessing the potential for intensification in town centres include:
 - a) assessments of demand for retail, office and other commercial uses
 - b) assessments of capacity for additional housing
 - c) public transport accessibility and capacity

- d) planned or potential transport improvements – to indicate future capacity for intensification
 - e) capacity and proximity of social infrastructure
 - f) existing and potential level of density of development and activity
 - g) relationship with wider regeneration initiatives
 - h) vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre
 - i) potential to complement local character, existing heritage assets and improve the quality of the town centre environment
 - j) viability of development.
- 5) identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example:
- a) comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks
 - b) redevelopment of town centre shopping frontages that are surplus to demand
 - c) redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing non-residential uses
 - d) delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.
- 6) support flexibility for temporary or ‘meanwhile’ uses of vacant properties.

- D Development proposals should:
- 1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment
 - 2) ensure that commercial space is appropriately located having regard to Part A and B above, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing
 - 3) support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents
 - 4) support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.

- 2.7.1 The London Plan takes a strong **town centres first** approach, in order to make the most of the agglomeration benefits and accessibility of town centres and to ensure sustainable patterns of development. Out-of-centre development can be particularly detrimental to town centres, undermining their economic performance, local character, and the accessibility they provide to a broad range of services, and encouraging increased trips by car. In order to support the vitality of town centres, it is important to take a sequential approach, focusing on sites within town centres before considering edge-of-centre sites. This ensures that town centre uses are not unnecessarily dispersed, maximises the overall growth potential of town centres and promotes investment in high streets and primary shopping frontages.
- 2.7.2 Borough's local Development Plan Documents should proactively plan to meet forecast need for main town centre uses by allocating sites within or (where justified) on the edge of town centres and through town centre boundary reviews, in order to support the town centres first approach. Where town centre and edge of centre sites are not available, local

Policy D2 Infrastructure requirements for sustainable densities

- A The density of development proposals should:
- 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels
 - 2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).²⁶
- B Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.
- C When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

26 PTAL and Time Mapping (TIM) catchment analysis is available on TfL's WebCAT webpage. TIM provides data showing access to employment, town centres, health services, and educational establishments as well as displaying the population catchment for a given point in London (see PTAL in glossary for more information on WebCAT and Time Mapping).

accessibility and capacity of an area, such as Crossrail 2, DLR extensions, extension of the Elizabeth Line, and the Bakerloo line Extension. It may be necessary to require the **phasing of development proposals** to maximise the benefits from major infrastructure and services investment whilst avoiding any unacceptable impacts on existing infrastructure prior to the new capacity being available.

- 3.2.6 In order to support the Healthy Streets Approach, development proposals should take account of the existing and planned **connectivity of a site via public transport and active modes** to town centres, social infrastructure and other services and places of employment. Opportunities to improve these connections to support higher density development should be identified.

Policy D3 Optimising site capacity through the design-led approach

The design-led approach

- A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part B.
- B Development proposals should:

Form and layout

- 1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and

legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area

- 3) be street-based with clearly defined public and private environments
- 4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience

- 5) achieve safe, secure and inclusive environments
- 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 7) deliver appropriate outlook, privacy and amenity
- 8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- 9) help prevent or mitigate the impacts of noise and poor air quality
- 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character

- 11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
- 12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well

- 13) aim for high sustainability standards (with reference to the policies within London Plan Chapter's 8 and 9) and take into account the principles of the circular economy
 - 14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.
- C Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

- 3.3.1 For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land. The design of the development must **optimise site capacity**. Optimising site capacity means ensuring that the development takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies. The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as Gypsy and Traveller pitches – is the optimum development for the site.
- 3.3.2 **A design-led approach** to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.
- 3.3.3 The **area assessment** required by Part A of Policy D1 London's form, character and capacity for growth, coupled with an area's assessed capacity for growth as required by Part B of Policy D1 London's form, character and capacity for growth, will assist in understanding a site's context and determining what form of development is most appropriate for a site. Design options for the site should be assessed to ensure the proposed development best delivers the design outcomes in Part B of this policy.
- 3.3.4 Designating appropriate development capacities through site allocations enables boroughs to proactively optimise the capacity of strategic sites

Policy D4 Delivering good design

Design analysis and development certainty

- A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.
- B Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

- C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.
- D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:
- 1) include a residential component that exceeds 350 units per hectare; or
 - 2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.

- E The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:
- 1) design reviews are carried out transparently by independent experts in relevant disciplines
 - 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme
 - 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews
 - 4) design review recommendations are appropriately recorded and communicated to officers and decision makers
 - 5) schemes show how they have considered and addressed the design review recommendations
 - 6) planning decisions demonstrate how design review has been addressed.

Maintaining design quality

- F The design quality of development should be retained through to completion by:
- 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development
 - 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
 - 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter

- 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

- 3.4.1 The processes and actions set out in the policy will help ensure development delivers good design. The responsibility for undertaking a particular process or action will depend on the nature of the development or plan; however, the outcome of this process must ensure the most efficient use of land is made so that the development on all sites is optimised.
- 3.4.2 Applicants will primarily be responsible for undertaking design analysis through the use of various **digital modelling techniques** as part of a wide range of design and presentation techniques. These techniques can also be used as part of the plan-making process to assess growth options and forms of development, as described in Part B of Policy D1 London's form, character and capacity for growth.
- 3.4.3 To enable the design of a proposed development to be fully assessed, applicants must provide the necessary **technical information** in an agreed format. The detail and nature of this should be commensurate with the scale of the development. All outline applications referred to the Mayor should be accompanied by thorough design codes, ensuring exemplary design standards are carried through the planning process to completion.
- 3.4.4 The **Mayor's Design Advocates (MDAs)** will play a key role in helping to deliver good design. They will help champion design across the GLA Group and beyond, through research, design review, capacity building, commissioning and advocacy. MDAs are also members of the London Review Panel, which the Mayor has set up to provide design scrutiny. This review panel is primarily focused on the review of Mayoral investments, but can provide design review sessions for development proposals referred to the Mayor where they have not previously been subject to review, or for schemes of particular significance.
- 3.4.5 All development proposals should be subject to a level of scrutiny appropriate to the scale and/or impact of the project. This **design scrutiny** should include work by planning case officers and ongoing and informal

Policy D6 Housing quality and standards

- A Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- B Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.
- C Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- D The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- E Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.
- F Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space

- 1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.

- 2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.
- 3) A one bedspace single bedroom must have a floor area of at least 7.5 sqm and be at least 2.15m wide.
- 4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sqm.
- 5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sqm within the Gross Internal Area).
- 6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.
- 7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sqm in a double bedroom and 0.36 sqm in a single bedroom counts towards the built-in storage requirement.
- 8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

Private outside space

- 9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1

The Mayor will produce guidance on the implementation of this policy for all housing tenures.

Table 3.1 - Minimum internal space standards for new dwellings²⁵

		Minimum gross internal floor areas and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3
	6p	99	106	112	

²⁵ New dwelling in this context includes new build, conversions and change of use.

	<ul style="list-style-type: none"> - features are designed to allow maintenance activities such as window cleaning, to be undertaken with ease - sufficient levels of secure, covered and conveniently located externally accessible storage is provided for deliveries and other bulky items - recycling and waste disposal, storage and any on site management facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services.
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* See also the London Waste and Recycling Board’s Waste Management Planning Advice for New Flatted Properties 2014. <http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/>

3.6.10 Other components of housing design are also important to improving the attractiveness of new homes as well as the Mayor’s wider objectives to improve the quality of Londoners’ environment. The Mayor intends to produce a single **guidance** document which clearly sets out the standards which need to be met in order to implement Policy D6 Housing quality and standards for all housing tenures, as well as wider qualitative aspects of housing developments. This will include guidance on daylight and sunlight standards. This will build on the guidance set out in the 2016 Housing SPG and the previous London Housing Design Guide.

Policy D7 Accessible housing

- A To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:
- 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’
 - 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building

Regulation requirement M4(2) 'accessible and adaptable dwellings'.

- 3.7.1 Many households in London require **accessible or adapted housing** to lead dignified and independent lives. In addition, Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation. To address these and future needs, Policy D7 Accessible housing should apply to all dwellings which are created via works to which Part M volume 1 of the Building Regulations applies,³⁰ which, at the time of publication of this Plan, generally limits the application of this policy to new build dwellings.
- 3.7.2 Where any part of an **approach route** – including the vertical circulation in the common parts of a block of flats – is shared between dwellings of different categories (i.e. M4(2) and M4(3)), the design provisions of the highest numbered category of dwelling served should be applied, to ensure that people can visit their neighbours with ease and are not limited by the design of communal areas. For residential disabled persons parking requirements - see Policy T6.1 Residential parking.
- 3.7.3 To ensure that all potential residents have **choice within a development**, the requirement for M4(3) wheelchair user dwellings applies to all tenures. Wheelchair user dwellings should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes.
- 3.7.4 Standard M4(3) wheelchair user dwellings distinguishes between '**wheelchair accessible**' (a home readily usable by a wheelchair user at the point of completion) and '**wheelchair adaptable**' (a home that can be easily adapted to meet the needs of a wheelchair user). Planning Practice Guidance³¹ states that Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, otherwise M4(3) dwellings should be wheelchair adaptable.

30 This is governed by the statutory instruments; No. 2214 Building and Buildings, England and Wales, and The Building Regulations 2010, http://www.legislation.gov.uk/ukxi/2010/2214/pdfs/ukxi_20102214_en.pdf and No. 767 Building and Buildings, England and Wales The Building Regulations &c. (Amendment) Regulations 2015 http://www.legislation.gov.uk/ukxi/2015/767/pdfs/ukxi_20150767_en.pdf.

31 <https://www.gov.uk/guidance/housing-optional-technical-standards>

Policy D9 Tall buildings

Definition

- A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London.

Locations

- B
- 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.
 - 2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
 - 3) Tall buildings should only be developed in locations that are identified in Development Plans.

Impacts

- C Development proposals should address the following impacts:
- 1) visual impacts
 - a) the views of buildings from different distances:
 - i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views
 - ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality

iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

- b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding
- c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan
- d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area
- e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it
- f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river
- g) buildings should not cause adverse reflected glare
- h) buildings should be designed to minimise light pollution from internal and external lighting

2) functional impact

- a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants
 - b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process
 - c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas
 - d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building
 - f) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area
 - g) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings
- 3) environmental impact
- a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

- b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions
 - c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building
- 4) cumulative impacts
- a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting

Public access

- D Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

3.9.1 Whilst high density does not need to imply high rise, **tall buildings** can form part of a **plan-led** approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design. The processes set out below will enable boroughs to identify

buildings are safe, taking account of the considerations set out in this policy, as a matter of priority.

Policy D13 Agent of Change

- A The Agent of Change principle places the responsibility for mitigating impacts from existing noise **and other nuisance-generating activities** or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise **and other nuisance-generating uses** in a sensitive manner when new development is proposed nearby.
- B Development should be designed to ensure that established noise **and other nuisance-generating uses** remain viable and can continue or grow without unreasonable restrictions being placed on them.
- C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
- D Development proposals should manage noise and other potential nuisances by:
- 1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
 - 2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
 - 3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

E Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.

- 3.13.1 For a long time, the responsibility for managing and **mitigating the impact of noise** and other nuisances on neighbouring residents and businesses has been placed on the business or activity making the noise or other nuisance, regardless of how long the business or activity has been operating in the area. In many cases, this has led to newly-arrived residents complaining about noise and other nuisances from existing businesses or activities, sometimes forcing the businesses or other activities to close.
- 3.12.2 The **Agent of Change principle** places the responsibility for mitigating the impact of noise and other nuisances firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, for example, applicants will need to design them in a more sensitive way to protect the new occupiers, such as residents, businesses, schools and religious institutions, from noise and other impacts. This could include paying for soundproofing for an existing use, such as a music venue. The Agent of Change principle works both ways. For example, if a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts.
- 3.13.3 The Agent of Change principle is included in the National Planning Policy Framework, and **Planning Practice Guidance** provides further information on how to mitigate the adverse impacts of noise and other impacts such as air and light pollution.³⁶
- 3.13.4 The Agent of Change principle predominantly concerns the impacts of noise-generating uses and activities but **other nuisances** should be considered under this policy. Other nuisances include dust, odour, light and vibrations (see Policy SI 1 Improving air quality and Policy T7 Freight and servicing). This is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates

36 NPPG, <https://www.gov.uk/topic/planning-development/planning-officer-guidance>

- 3.13.10 **Noise and other impact assessments** accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the **particular** characteristics of existing uses can be properly captured and assessed. For example, **some businesses and activities** can have peaks of noise at different times of the day and night and on different days of the week, and boroughs should require a noise impact assessment to take this into consideration. Boroughs should pay close attention to the assumptions made and methods used in impact assessments to ensure a full and accurate assessment.
- 3.13.11 Reference should be made to Policy D13 Noise which considers the impacts of noise-generating activities on a wider scale and Policy SI 1 Improving air quality which considers the impacts of existing air pollution. **Further guidance** on managing and mitigating noise in development is also provided in the Mayor's London Environment Strategy.

Policy D14 Noise

- A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
- 1) avoiding significant adverse noise impacts on health and quality of life
 - 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
 - 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
 - 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
 - 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout,

orientation, uses and materials – in preference to sole reliance on sound insulation

- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

B Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.

3.14.1 The **management of noise** is about encouraging the right acoustic environment, both internal and external, in the right place at the right time. This is important to promote good health and a good quality of life within the wider context of achieving sustainable development. The management of noise should be an integral part of development proposals and considered as early as possible. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes. This can mean allowing some places or certain times to become noisier within reason, whilst others become quieter. Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise-sensitive wildlife species, or parks and green spaces affected by traffic noise and pollution. Boroughs, developers, businesses and other stakeholders should work collaboratively to identify the existing noise climate and other noise issues to ensure effective management and mitigation measures are achieved in new development proposals.

3.14.2 The **Agent of Change Principle** places the responsibility for mitigating impacts from existing noise-generating activities or uses on the new development. Through the application of this principle existing land uses

Policy H1 Increasing housing supply

- A Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.
- B To ensure that ten-year housing targets are achieved, boroughs should:
- 1) prepare delivery-focused Development Plans which:
 - a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification
 - b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2
 - c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.
 - 2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

- a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station³⁹ or town centre boundary⁴⁰
- b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets
- c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses
- d) the redevelopment of surplus utilities and public sector owned sites
- e) small sites (see Policy H2 Small sites)
- f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic

Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.

- 3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

- C Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.
- D Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.
- E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.
- F On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.

Policy H4 Delivering affordable housing

- A The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:
- 1) requiring major developments which trigger affordable housing requirements⁵⁰ to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)
 - 2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided
 - 3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners⁵¹

50 All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites

51 Strategic partners are affordable housing providers who commit to deliver ambitious development programmes through a flexible partnership with the Mayor. Each partnership involves at least 1,000 new housing starts, with at least 60 per cent of them genuinely affordable.

- 4) public sector land⁵² delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
- 5) industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

B Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

4.4.1 **Delivering more genuinely affordable housing**⁵³ is a key strategic issue for London. Meeting the need for circa 43,500 affordable homes per year, as established in the 2017 Strategic Housing Market Assessment, will require an increase in affordable housing contributions from all sources. All schemes are expected to maximise the delivery of affordable housing and make the most efficient use of available resources. This is critical to enabling London to meet the housing needs of its workforce and maintain the function and resilience of the city.

4.4.2 Past approaches have not adequately met levels of housing need. To provide greater certainty, speed up the planning process and increase affordable housing delivery, the Mayor is adopting a **threshold approach to viability**. This means that schemes meeting or exceeding the threshold without public subsidy,⁵⁴ and consistent with the requirements in Part C of Policy H5 Threshold approach to applications, are not required to submit viability information. The threshold approach was first introduced in the Mayor's Affordable Housing and Viability SPG. It provides the opportunity to move away from protracted viability debates, create certainty in terms of affordable housing requirements, embed the requirements into land values,

52 Separate affordable housing requirements apply to estate regeneration schemes on public sector land, which are set out in Policy H8 Loss of existing housing and estate redevelopment.

53 The NPPF defines affordable housing for planning purposes. Within this broad definition, sections 4.6.3 - 4.6.9 of this Plan set out the Mayor's preferred affordable housing tenures and other genuinely affordable housing products

54 Public subsidy includes grant, public loans (including the Mayor's London Housing Bank) and any public land at a reduced cost

housing and any cash in lieu or off-site contribution should deliver units in addition to this.

- 4.4.12 Cash in lieu contributions should be held in a **separate affordable housing pot**, where resources can be pooled and ring-fenced to enable greater, or more appropriate, new provision to be made off-site. This should either be on an identified site or as part of an agreed programme, in compliance with the statutory tests for use of planning obligations.⁵⁶
- 4.4.13 To avoid incentivising off-site provision or in lieu contributions, agreements for this should provide no financial benefit to the applicant relative to on-site provision and should include **review mechanisms** in line with the Viability Tested Route. The policy target for schemes delivering off-site affordable housing or in lieu contributions is 50 per cent affordable housing provided across the main site and any linked sites when considered as a whole.
- 4.4.14 Boroughs must have in place **monitoring arrangements** to ensure that the additional homes are delivered. As per Policy H7 Monitoring of affordable housing, the Mayor requires information on off-site and cash in lieu delivery as part of the data collection for the Annual Monitoring Report.

Policy H5 Threshold approach to applications

- A The threshold approach applies to major development proposals which trigger affordable housing requirements (see paragraph 4.5.15 for scheme types with bespoke approaches).
- B The threshold level of affordable housing on gross residential development is initially set at:
- 1) a minimum of 35 per cent; or
 - 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or
 - 3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate

56 Community Infrastructure Levy Regulations 2010 (SI 2010 No 948), Regulation 122(2). Crown Copyright, 2010: http://www.legislation.gov.uk/uksi/2010/948/pdfs/ukxi_20100948_en.pdf

for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.

- C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:
- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy
 - 2) be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)
 - 3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
 - 4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.
- D Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant.
- E Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)
- F Where an application does not meet the requirements set out in Part C it must follow the **Viability Tested Route**. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:
- 1) the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG
 - 2) viability tested schemes will be subject to:

- a) an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough
- b) a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough
- c) Mid Term Reviews prior to implementation of phases for larger phased schemes.

G Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

Scheme amendments – Section 73 applications and deeds of variations

H For schemes that were approved under the Fast Track Route, and schemes determined before the threshold approach that would have qualified for the Fast Track Route, any subsequent applications to vary the consent will not be required to submit viability information, providing the resultant development continues to meet the relevant threshold and the criteria in Part C.

I For schemes where the original permission did not meet the threshold or required tenure split, including schemes determined before the threshold approach that would not have qualified for the Fast Track Route, viability information will be required where an application is submitted to vary the consent, and the borough or the Mayor where relevant, consider this would materially alter the economic circumstances of the scheme. Such cases will be assessed under the Viability Tested Route.

J Any proposed amendments that result in a reduction in affordable housing, affordability or other obligations or requirements of the original permission should be rigorously assessed under the Viability Tested Route. In such instances, a full viability review should be undertaken that reconsiders the value, costs, profit requirements and land value of the scheme.

K The Mayor should be consulted on any proposed amendments on referable schemes that change the level of affordable housing from that which was secured through the original planning permission.

- 4.5.1 Applicants are strongly encouraged to take the **Fast Track Route** by providing the threshold level of affordable housing and meeting other Development Plan requirements to the satisfaction of the borough.
- 4.5.2 The **Viability Tested Route** will assess the maximum level of affordable housing that a scheme can deliver in cases where the threshold level of affordable housing cannot be met and where fixed or minimum affordable housing requirements are not in place. It is possible that, via the viability assessment using the detailed methodology in the SPG, a greater affordable housing contribution than the threshold level will be found to be viable and thus will be required.
- 4.5.3 The percentage of affordable housing on a scheme should be measured in **habitable rooms**⁵⁷ to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using **habitable floorspace**.⁵⁸ Applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison.
- 4.5.4 The thresholds set out in this policy have been informed by viability testing. This approach seeks to **embed affordable housing requirements into land values** and create consistency and certainty across London. The 35 per cent threshold level will be monitored and reviewed in 2021 to determine whether this threshold should be increased. Any changes to the threshold will be consulted on as part of an updated Affordable Housing and Viability SPG or through a focused review of the London Plan.
- 4.5.5 The Mayor recognises that **public sector land** can play a significant role in meeting affordable housing need. The threshold for public sector land (land that is owned or in use by a public sector organisation, or company

57 Habitable room is defined in the Glossary

58 Habitable floorspace is defined in the Glossary

identifies the uplift in value arising from the grant of planning permission because it enables comparison with the value of the site without planning permission. The EUV+ approach is usually the most appropriate approach for planning purposes. It can be used to address the need to ensure that development is sustainable in terms of the NPPF and Development Plan requirements, and in most circumstances the Mayor will expect this approach to be used. An alternative approach should only be considered in exceptional circumstances which must be robustly justified by the applicant and/or the borough in line with the Mayor's SPG.

- 4.5.14 **Viability Review mechanisms** should be applied to all viability tested applications at early and late stages in the development process (and mid-term reviews in the case of longer phased schemes) to ensure that affordable housing delivery is maximised as a result of any future improvement in viability. Further guidance is provided in the Affordable Housing and Viability SPG.
- 4.5.15 Some schemes are not suitable to follow the Fast Track Route. These schemes must follow the **Viability Tested Route**. This includes:
- applications which propose affordable housing **off-site or a cash in lieu contribution** (as set out above)
 - applications for schemes that involve the **demolition of existing affordable dwellings** which should follow the approach set out in Policy H8 Loss of existing housing and estate redevelopment
 - schemes claiming the **vacant building credit**.
- 4.5.16 Policy H11 Build to Rent, Policy H13 Specialist older persons housing, Policy H15 Purpose-built student accommodation and Policy H16 Large-scale purpose-built shared living set out specific affordable housing approaches in those types of development.

Policy H6 Affordable housing tenure

- A The following split of affordable products should be applied to residential development:

- 1) a minimum of 30 per cent low cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
- 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
- 3) the remaining 40 per cent to be determined by the borough as low cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

B To follow the Fast Track Route the tenure of 35 per cent of homes must meet the requirements set out in Part A. The Fast Track Route is also available to applicants that elect to provide low-cost rented homes in place of intermediate homes, provided the relevant threshold level is reached. Where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in Part A1 and Part A2), and should take into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular tenure.

4.6.1 The 2017 SHMA shows London's significant need for low cost rental housing; however, the current national funding programme is focused on intermediate products which limits the Mayor's ability to require higher levels of low-cost rented accommodation. The **tenure splits** set out in this policy provide sufficient flexibility to be tailored to meet local needs as well as ensuring that new development delivers a minimum level of low-cost rented accommodation and intermediate accommodation, contributing to the delivery of mixed and inclusive communities. The minimums in Part A1 and Part A2 will be monitored and reviewed in 2021 and, if necessary, updated through Supplementary Planning Guidance, taking account of future affordable housing funding agreements.

4.6.2 There is a presumption that the **40 per cent to be decided by the borough** will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London. However, it is recognised that for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or

short-term holiday rentals can have a detrimental impact on neighbours' residential amenity and community cohesion in the wider area where concentrated in a particular location. The use also reduces the supply of homes available for people to live in.

- 4.9.4 **Houses in multiple occupation** (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, give rise to concern. Where they are of a reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs.

Policy H10 Housing size mix

- A Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
- 1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
 - 2) the requirement to deliver mixed and inclusive neighbourhoods
 - 3) the need to deliver a range of unit types at different price points across London
 - 4) the mix of uses in the scheme
 - 5) the range of tenures in the scheme
 - 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which

are closer to a town centre or station or with higher public transport access and connectivity

7) the aim to optimise housing potential on sites

8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock

9) the role of one and two bed units in freeing up family housing

B For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:

1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households

2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation

3) the impact of welfare reform

4) the cost of delivering larger units and the availability of grant.

4.10.1 The 2017 London Strategic Housing Market Assessment (SHMA) estimated the **unit size mix of new homes** required to meet London's current and projected housing needs using three different scenarios, the results of which are set out in the SHMA report addendum. The main factors influencing this size mix include the projected growth in different household types, assumptions about under-occupation, and the substantial number of overcrowded households in London, whose needs can be addressed by providing family-sized homes but also smaller homes for concealed households to move into. Boroughs can draw on the scenarios in the SHMA to understand housing mix requirements or to inform local assessments. While the SHMA identifies the full range of needs between 2016 and 2041, boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units of particular sizes.

community activities, including nurseries, children’s centres, cultural, youth and sports activities. Designing schools and colleges with this shared use in mind, and ensuring they are safe for a range of uses, also allows for more adaptability around changing work and lifestyle patterns, and extended childcare and holiday provision. Sharing of facilities such as sports pitches and multi-use games areas and locating schools next to parks and open spaces can also further encourage the **shared use of space**, particularly where space on a school or college site is limited. Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities.

Policy S4 Play and informal recreation

A Boroughs should:

- 1) prepare Development Plans that are informed by a needs assessment of children and young person’s play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision. Boroughs should consider the need for cross-borough collaboration where appropriate
- 2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.

B Development proposals for schemes that are likely to be used by children and young people should:

- 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile
- 2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
 - a) provides a stimulating environment

- b) can be accessed safely from the street by children and young people independently
 - c) forms an integral part of the surrounding neighbourhood
 - d) incorporates trees and/or other forms of greenery
 - e) is overlooked to enable passive surveillance
 - f) is not segregated by tenure
- 3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
 - 4) for large-scale public realm developments, incorporate incidental play space to make the space more playable
 - 5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future demand for play provision.

5.4.1 **Safe and stimulating play** is essential for children and young people's mental and physical health. It is not just an activity confined to playgrounds and play areas but is something that can be done in all aspects of a child's life, in a wide variety of locations and environments. Accessing a variety of opportunities for play and being able to be independently mobile within their neighbourhood, is important for children and young people's wellbeing and development. When preparing needs assessments, boroughs should consult with children and young people to ensure their needs are understood in terms of existing and future provision.

5.4.2 Many children and young people, however, find that there are limited opportunities for them to play in their local neighbourhood. This is often not because of a lack of formal play provision, but due to restrictive street design and layouts, poor links between spaces for play and recreation, and the threat of busy roads and traffic. Developments should **encourage children and young people to move around freely** through safe streets

London sites providing sustainable distribution services for the Central Activities Zone and Northern Isle of Dogs may be particularly appropriate for this designation.

Policy E7 Industrial intensification, co-location and substitution

- A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:
- 1) introduction of small units
 - 2) development of multi-storey schemes
 - 3) addition of basements
 - 4) more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.
- B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or masterplanning process.

- C Mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where:
- 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
 - 2) it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or
 - 3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part C of Policy E2 Providing suitable business space).

Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Parts D2 to D4 below.

- D The processes set out in Parts B and C above must ensure that:
- 1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing
 - 2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
 - 3) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
 - 4) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:
 - a) safety and security

- b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
- c) design quality, public realm, visual impact and amenity for residents
- d) agent of change principles
- e) vibration and noise
- f) air quality, including dust, odour and emissions and potential contamination.

E Development Plans and planning frameworks should consider, in collaboration with the GLA and neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:

- 1) this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land
- 2) full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles
- 3) a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.

This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) and not through ad hoc planning applications.

6.7.1 In collaboration with the Mayor, all boroughs are encouraged to explore the potential to **intensify industrial activities**¹¹¹ on industrial land to deliver **additional capacity** and to consider whether some types of industrial

111 Industrial Intensification Primer, GLA 2017; CAG Consulting, London Industrial Land Demand Study, GLA 2017

local economies and provide diverse employment opportunities for local residents. Boroughs are encouraged to identify these sectors and clusters and set out policies in Local Plans that support their growth, having regard in particular to public transport provision and ensuring the vitality and viability of town centres.

Policy E9 Retail, markets and hot food takeaways

- A** A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres (Policy SD6 Town centres and high streets, Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation).
- B** In Development Plans, boroughs should:
- 1) identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and local evidence of demand and supply
 - 2) identify areas for consolidation of retail space where this is surplus to requirements
 - 3) set out policies and site allocations to secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies. Particular consideration should be given to the contribution large-scale commercial development proposals (containing over 2,500 sqm gross A Use Class floorspace) can make to the provision of small shops and other commercial units. Where justified by evidence of local need, policies should secure affordable commercial and shop units.
- C** Development Plans and development proposals should:
- 1) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres

- 2) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel
- 3) provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping
- 4) identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with town centre Policy SD7 Town centres: development principles and Development Plan Documents
- 5) support London's markets in their full variety, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres and the Central Activities Zone
- 6) manage existing edge of centre and out of centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with Policy SD6 Town centres and high streets, Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation to realise their full potential for housing intensification, reducing car use and dependency, and improving access by walking, cycling and public transport
- 7) manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:
 - a) town centre vitality, viability and diversity
 - b) sustainability and accessibility
 - c) place-making or local identity

d) community safety or security

e) mental and physical health and wellbeing.

- D Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also carefully manage the over-concentration of A5 hot food takeaway uses within town centres and other areas through the use of locally-defined thresholds in Development Plans.
- E Where development proposals involving A5 hot food takeaway uses are permitted, boroughs should encourage operators to comply with the Healthier Catering Commitment standards. Where justified, boroughs should ensure compliance with the Healthier Catering Commitment through use of a condition.
- F Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (and in accordance with town centre Policy SD7 Town centres: development principles and Development Plan Documents) and residential development.

- 6.9.1 A diverse and competitive retail sector that meets the needs of Londoners and visitors to the capital is important. **Retailing is undergoing restructuring** in response to recent trends and future forecasts for consumer expenditure, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet. As a result, retailing has evolved to become multi-channel, with a mix of physical stores, often supported by internet 'click and collect' in store or deliveries to homes, workplaces or pick-up points, and in other cases purely online businesses with no physical stores.

Policy HC1 Heritage conservation and growth

- A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:
- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
 - 2) utilising the heritage significance of a site or area in the planning and design process
 - 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
 - 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
- C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

- 7.1.1 London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of **local, national and international value**. London's heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth. The Mayor will develop a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth.
- 7.1.2 London's **diverse range of designated and non-designated heritage assets** contributes to its status as a world-class city. Designated assets currently include four World Heritage Sites, over 1,000 conservation areas, 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows, ancient woodlands, and ancient and veteran trees. The distribution of designated assets differs across different parts of London, and is shown in Figure 7.1, Figure 7.2, Figure 7.3, and Figure 7.4. Note that these maps are for illustrative purposes only.

Policy G4 Open space

A Development Plans should:

- 1) undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required.¹⁴⁰ Assessments should take into account the quality, quantity and accessibility of open space
- 2) include appropriate designations and policies for the protection of open space to meet needs and address deficiencies
- 3) promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change
- 4) ensure that open space, particularly green space, included as part of development remains publicly accessible.

B Development proposals should:

- 1) not result in the loss of protected open space
- 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency.

8.4.1 Open spaces, particularly those planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a **vital component of London’s infrastructure**. All types of open space, regardless of their function, are valuable in their ability to connect Londoners to open spaces at the neighbourhood level. Connectivity across the network of open spaces is particularly important as this provides opportunities for walking and cycling. Green spaces are especially important for improving wildlife corridors.

140 <https://www.gigl.org.uk/open-spaces/areas-of-deficiency-in-access-to-public-open-space/?highlight=open%20space%20deficiency>

Open Space categorisation	Description	Size guideline	Distance from homes
Pocket Parks	These are small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment.	under 0.4 ha	less than 400 m
Linear Open Spaces	These are open spaces and towpaths alongside the Thames, canals and other waterways, paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space.		
<p>This table gives examples of typical open space typologies in London; other open space types may be included to reflect local circumstances</p>			

Policy G5 Urban greening

A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

- B** Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).
- C** Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

- 8.5.1 The inclusion of **urban greening measures** in new development will result in an increase in green cover, and **should be integral to planning** the layout and design of new buildings and developments. This should be considered from the beginning of the design process.
- 8.5.2 **Urban greening** covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can help to meet other policy requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited. The management and ongoing maintenance of green infrastructure should be considered and secured through the planning system where appropriate.
- 8.5.3 A number of cities have successfully adopted a ‘green space factor’ to encourage more and better urban greening. The Mayor has developed a generic **Urban Greening Factor** model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. This is based on a review of green space factors in other cities.¹⁴¹ The factors outlined in Table 8.2 are a simplified measure of various benefits provided by soils, vegetation and water based on their

141 Urban Greening Factor for London
https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf

- G <https://www.thenbs.com/knowledge/the-nbs-guide-to-facade-greening-part-two>
- H <https://www.rhs.org.uk/advice/profile?PID=818>
- I <https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>
- J <http://www.susdrain.org>

Policy G6 Biodiversity and access to nature

- A Sites of Importance for Nature Conservation (SINCs) should be protected.
- B Boroughs, in developing Development Plans, should:
- 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
 - 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
 - 3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
 - 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
 - 5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
- C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

	1) avoid damaging the significant ecological features of the site
	2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
	3) deliver off-site compensation of better biodiversity value.
D	Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
E	Proposals which reduce deficiencies in access to nature should be considered positively.

8.6.1 **Sites of Importance for Nature Conservation** (SINCs) comprise:

1. Sites of Metropolitan Importance – strategically-important conservation sites for London
2. Sites of Borough Importance – sites which support habitats or species of value at the borough level
3. Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.

n.b. Several Sites of Metropolitan Importance also have statutory European or national nature conservation designations (see paragraph 8.6.3)

8.6.2 The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks. When undertaking comprehensive reviews of SINCs across a borough, or when identifying or amending Sites of Metropolitan Importance, boroughs should consult the London Wildlife Sites Board.

8.6.3 Sites with a formal **European or national designation** (including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest, National Nature Reserves and Local Reserves) are protected by legislation. There are legal provisions which ensure these sites are not

will be producing guidance to set out how biodiversity net gain applies in London.

Policy G7 Trees and woodlands

- A London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
- B In their Development Plans, boroughs should:
- 1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site¹⁴³
 - 2) identify opportunities for tree planting in strategic locations.
- C Development proposals should ensure that, wherever possible, existing trees of value are retained.¹⁴⁴ If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

8.7.1 Trees and woodlands play an important role within the urban environment. They help to trap air pollutants, add to amenity, provide shading, absorb rainwater and filter noise. They also provide extensive areas of habitat for wildlife, especially mature trees. The urban forest is an important element of London's green infrastructure and comprises all the trees in the urban realm, in both public and private spaces, along linear routes and waterways, and in amenity areas. The Mayor and Forestry

¹⁴³ Forestry Commission/Natural England (2018): Ancient woodland and veteran trees; protecting them from development

¹⁴⁴ <https://www.gov.uk/guidance/planning-applications-affecting-trees-and-woodland>
Category A, B and lesser category trees where these are considered by the local planning authority to be of importance to amenity and biodiversity, as defined by BS 5837:2012

Policy SI 1 Improving air quality

- A Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.
- B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:
- 1 Development proposals should not:
 - a) lead to further deterioration of existing poor air quality
 - b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
 - c) create unacceptable risk of high levels of exposure to poor air quality.
 - 2 In order to meet the requirements in Part 1, as a minimum:
 - a) development proposals must be at least Air Quality Neutral
 - b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures
 - c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
 - d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

- C Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:
- a) how proposals have considered ways to maximise benefits to local air quality, and
 - b) what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.
- D In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.¹⁵¹
- E Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

9.1.1 **Poor air quality** is a major issue for London which is failing to meet requirements under legislation. Poor air quality has direct impacts on the health, quality of life and life expectancy of Londoners. The impacts tend to be most heavily felt in some of London's most deprived neighbourhoods, and by people who are most vulnerable to the impacts, such as children and older people. London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced.

9.1.2 The Mayor is committed to **making air quality in London the best of any major world city**, which means not only achieving compliance with legal

151 Guidance is currently in 'The control of dust and emissions for construction and demolition SPG'

- 9.1.19 All London boroughs have declared AQMAs covering some or all of their area. Boroughs are required to produce **Air Quality Action Plans** setting out the actions they are taking to improve local air quality; planning decisions should be in accordance with these action plans and developers should take any local requirements in Air Quality Action Plans into account.
- 9.1.20 AQFAs are defined based on GLA modelling forecasts that incorporate actions taken by the GLA and others as well as broader changes in emissions sources and are not intended to supplant the role of AQMAs in planning decisions. In practice **developers will need to consider both designations** where they overlap.
- 9.1.21 It may not always be possible in practice for developments to achieve Air Quality Neutral standards or to acceptably minimise impacts using on-site measures alone. If a development can demonstrate that it has exploited all relevant on-site measures it may be possible to make the development acceptable through **additional mitigation or offsetting payments**.
- 9.1.22 Where there have been significant **improvements to air quality** resulting in an area no longer exceeding air quality limits, Development Plans should not take advantage of this investment and worsen the local air quality back to a poor level. The sustainability appraisal for local plans should consider the effect of national, London-wide and local programmes to improve air quality to ensure that any potential conflicts are avoided.
- 9.1.23 **Further guidance** will be published on Air Quality Neutral and air quality positive approaches as well as guidance on how to reduce construction and demolition impacts.

Policy SI 2 Minimising greenhouse gas emissions

- A Major development should be net zero-carbon.¹⁵⁵ This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation

155 Where zero-carbon is used in the Plan it refers to net zero-carbon – see glossary for definition.

	<ol style="list-style-type: none">2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site4) be seen: monitor, verify and report on energy performance.
B	Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
C	<p>A minimum on-site reduction of at least 35 per cent beyond Building Regulations¹⁵⁶ is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:</p> <ol style="list-style-type: none">1) through a cash in lieu contribution to the borough's carbon offset fund, or2) off-site provided that an alternative proposal is identified and delivery is certain.
D	Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.
E	Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
F	Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole

156 Building Regulations 2013. If these are updated, the policy threshold will be reviewed <https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>

Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

- 9.2.1 The Mayor is committed to London **becoming a zero-carbon city**. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent.¹⁵⁷ London's homes and workplaces are responsible for producing approximately 78 per cent of its greenhouse gas emissions. If London is to achieve its objective of becoming a zero-carbon city by 2050, new development needs to meet the requirements of this policy. Development involving major refurbishment should also aim to meet this policy.
- 9.2.2 **The energy hierarchy** (Figure 9.2) should inform the design, construction and operation of new buildings. The priority is to minimise energy demand, and then address how energy will be supplied and renewable technologies incorporated. An important aspect of managing demand will be to reduce peak energy loadings.
- 9.2.3 Boroughs should ensure that all developments maximise opportunities for **on-site electricity and heat production** from solar technologies (photovoltaic and thermal) and use innovative building materials and smart technologies. This approach will reduce carbon emissions, reduce energy costs to occupants, improve London's energy resilience and support the growth of green jobs.

157 'Carbon' is used in the London Plan as a shorthand term for all greenhouse gases. London's carbon accounting is measured in carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions.

Policy SI 3 Energy infrastructure

- A Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.
- B Energy masterplans should be developed for large-scale development locations (such as those outlined in Part A and other opportunities) which establish the most effective energy supply options. Energy masterplans should identify:
- 1) major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
 - 2) heat loads from existing buildings that can be connected to future phases of a heat network
 - 3) major heat supply plant including opportunities to utilise heat from energy from waste plants
 - 4) secondary heat sources, including both environmental and waste heat
 - 5) opportunities for low and ambient temperature heat networks
 - 6) possible land for energy centres and/or energy storage
 - 7) possible heating and cooling network routes
 - 8) opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
 - 9) infrastructure and land requirements for electricity and gas supplies

- 10) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector
- 11) opportunities to maximise renewable electricity generation and incorporate demand-side response measures.

C Development Plans should:

- 1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure
- 2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.

D Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:

- 1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
 - a) connect to local existing or planned heat networks
 - b) use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
 - c) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
 - d) use ultra-low NO_x gas boilers
- 2) CHP and ultra-low NO_x gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality

3) where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.

E) Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.

- 9.3.1 The Mayor will work with boroughs, energy companies and major developers to promote the **timely and effective development of London's energy system** (energy production, distribution, storage, supply and consumption).
- 9.3.2 London is part of a national energy system and currently sources approximately 95 per cent of its energy from outside the GLA boundary. Meeting the **Mayor's zero-carbon target by 2050** requires changes to the way we use and supply energy so that power and heat for our buildings and transport is generated from **local** clean, low-carbon and renewable sources. London will need to shift from its reliance on using natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources. Decentralised energy and local secondary heat sources will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs.
- 9.3.3 Many of London's existing **heat networks** have grown around combined heat and power (CHP) systems. However, the carbon savings from gas engine CHP are now declining as a result of national grid electricity decarbonising, and there is increasing evidence of adverse air quality impacts. Heat networks are still considered to be an effective and low-carbon means of supplying heat in London, and offer opportunities to transition to zero-carbon heat sources faster than individual building approaches. Where there remains a strategic case for low-emission CHP systems to support area-wide heat networks, these will continue to be considered on a case-by-case basis. Existing networks will need to establish decarbonisation plans. These should include the identification of low- and zero-carbon heat sources that may be utilised in the future, in order to be zero carbon by 2050. The Mayor will consider how boroughs and network operators can be supported to achieve this.

overall energy consumption, reduce peak demand and integrate greater levels of renewable energy into the energy system.

Policy SI 4 Managing heat risk

- A Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- B Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure
 - 2) minimise internal heat generation through energy efficient design
 - 3) manage the heat within the building through exposed internal thermal mass and high ceilings
 - 4) provide passive ventilation
 - 5) provide mechanical ventilation
 - 6) provide active cooling systems.

- 9.4.1 Climate change means London is already experiencing higher than historic average temperatures and more severe hot weather events. This, combined with a growing population, urbanisation and the urban heat island effect, means that **London must manage heat risk** in new developments, using the cooling hierarchy set out above. Whilst the cooling hierarchy applies to major developments, the principles can also be applied to minor development.

used for non-domestic developments. In addition, TM 49 guidance and datasets should also be used to ensure that all new development is designed for the climate it will experience over its design life. Further information will be provided in guidance on how these documents and datasets should be used.

Policy SI 5 Water infrastructure

- A In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.
- B Development Plans should promote improvements to water supply infrastructure to contribute to security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account.
- C Development proposals should:
- 1) through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
 - 2) achieve at least the BREEAM excellent standard for the 'Wat 01' water category¹⁶⁴ or equivalent (commercial development)
 - 3) incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.
- D In terms of water quality, Development Plans should:
- 1) promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans

¹⁶⁴ Achieve at least a 12.5% improvement over defined baseline performance standard

2) support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.

E Development proposals should:

- 1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided
- 2) take action to minimise the potential for misconnections between foul and surface water networks.

F Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage.

9.5.1 Londoners consume on average 149 litres of water per person per day – around 8 litres above the national average. All water companies that serve London are located in areas classified as seriously water-stressed. London is at risk of drought after two dry winters. During 2006 and 2012 **water use restrictions** affecting London were imposed. These restrictions were limited to sprinkler, hosepipe and non-essential user bans. A severe drought – with rota cuts, standpipes, reduced mains pressure or adding non-potable water to the mains supply – would have major implications for Londoners' health and wellbeing, the environment and London's economy. The Mayor will work with the water industry to prevent this level of water restriction being required for London in future.

9.5.2 An important aspect of avoiding the most severe water restrictions is to ensure that leakage is reduced and **water used as efficiently as possible**. The Optional Requirement set out in Part G of the Building Regulations should be applied across London.¹⁶⁵ A fittings-based approach

¹⁶⁵ Planning Practice Guidance: Paragraph 014 of 'Housing: optional technical standards' (DCLG, 27 March 2015): Where there is a clear local need, local planning authorities can set out Local Plan

tidal-fluvial interface. The Flood Risk Management Plan should inform the boroughs' Strategic Flood Risk Assessments.

- 9.12.6 In terms of mitigating **residual risk**, it is important that a strategy for resistance and then resilience including safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services. In the case of a severe flood, especially a tidal flood, many thousands of properties could be affected. This will make rescue and the provision of temporary accommodation challenging. Designing buildings such that people can remain within them and be safe and comfortable in the unlikely event of such a flood, will improve London's resilience to such an event.

Policy SI 13 Sustainable drainage

- A Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.
- B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:
- 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
 - 2) rainwater infiltration to ground at or close to source
 - 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
 - 4) rainwater discharge direct to a watercourse (unless not appropriate)
 - 5) controlled rainwater discharge to a surface water sewer or drain
 - 6) controlled rainwater discharge to a combined sewer.

- C Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.
- D Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

- 9.13.1 London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as ensuring that appropriate maintenance arrangements are put in place. **Local Flood Risk Management Strategies and Surface Water Management Plans** should ensure they address flooding from multiple sources including surface water, groundwater and small watercourses that occurs as a result of heavy rainfall.
- 9.13.2 Development proposals should aim to get as close to greenfield run-off rates¹⁷⁷ as possible depending on site conditions. The **well-established drainage hierarchy** set out in this policy helps to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible. There should be a preference for green over grey features, and drainage by gravity over pumped systems. A blue roof is an attenuation tank at roof or podium level; the combination of a blue and green roof is particularly beneficial as the attenuated water is used to irrigate the green roof.
- 9.13.3 For many sites, it may be appropriate to use **more than one form of drainage**, for example a proportion of rainwater can be managed by more sustainable methods, with residual rainwater managed lower down the hierarchy. In some cases, direct discharge into the watercourse is an appropriate approach, for example rainwater discharge into the tidal Thames or a dock. This should include suitable pollution prevention filtering measures, ideally by using soft engineering or green infrastructure. In addition, if direct discharge is to a watercourse where the outfall is likely to be affected by tide-locking, suitable storage should be designed into the

177 The runoff that would occur from a site in undeveloped natural state.

Policy T1 Strategic approach to transport

- A Development Plans should support, and development proposals should facilitate:
- 1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041
 - 2) the proposed transport schemes set out in Table 10.1.
- B All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

10.1.1 The integration of land use and transport, and the provision of a robust and resilient public transport network, are essential in realising and maximising growth and ensuring that different parts of the city are connected in a sustainable and efficient way. In order to help facilitate this, an integrated **strategic approach to transport** is needed, with an ambitious aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use, which the policies in the Plan and the Mayor's Transport Strategy seek to deliver, London cannot continue to grow sustainably. To achieve sustainable growth, Development Plans should support walking, cycling and public transport through policies that support mode shift and the schemes in Table 10.1. Development proposals should facilitate sustainable travel through their location and design and by not precluding the implementation of the schemes in Table 10.1.

10.1.2 A shift from car use to more space-efficient travel also provides the only long-term **solution to the road congestion** challenges that threaten London's status as an efficient, well-functioning globally-competitive city. Reliable deliveries and servicing, and easy access to workplaces and key attractions are dependent on an increasingly-efficient transport network. Roads will continue to play a vital role in this, and greater priority needs to

Policy T2 Healthy Streets

- A Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.
- B Development Plans should:
- 1) promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.
 - 2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.
- C In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.
- D Development proposals should:
- 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance
 - 2) reduce the dominance of vehicles on London's streets whether stationary or moving
 - 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

Policy T3 Transport capacity, connectivity and safeguarding

- A Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections.
- B Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:
- 1) safeguarding existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)
 - 2) identifying and safeguarding new sites/space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing
 - 3) safeguarding London's walking and cycling networks
- C Development Plans should appropriately safeguard the schemes outlined in Table 10.1. Development proposals should provide adequate protection for and/or suitable mitigation to allow the relevant schemes outlined in Table 10.1 to come forward. Those that do not, or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused.
- D In Development Plans and development decisions, particular priority should be given to securing and supporting the delivery of upgrades to Underground lines, Crossrail 2, the Bakerloo line extension, river crossings and an eastwards extension of the Elizabeth line.

E Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.

Table 10.1 - Indicative list of transport schemes

Healthy Streets and active travel		
Scheme	Cost*	Timescale
Accessibility and inclusivity embedded in planning and design of Healthy Streets	low	2017-2041
Borough-led traffic reduction strategies (including workplace parking levies)	low	2017-2030
Cycle Hire network development	medium	2017-2041
Cycle network development (London-wide)	medium	2017-2030
Electric vehicle charging infrastructure	low	2017-2041
Freight consolidation programme	medium	2017-2041
Freight fleet emissions reductions	low	2017-2041
Highway decks to release land for housing (subject to further assessment)	high	2017-2030
Personal safety and security improvements on London's streets	low	2017-2041
Road pricing: existing schemes reviewed	low	2018-2020
Road pricing: next generation charging (subject to further assessment)	med/high	2022-2041
Street trees increases	low	2017-2041
Sustainable drainage system improvements on railway land	low	2017-2041

well as walking and cycling crossings, across the Thames will help to improve access to employment opportunities, support the development of thousands of new homes and enable healthier lifestyles.

- 10.3.11 The **bus network** also has an increasingly important role to play in the development of London, particularly delivering orbital connections. Therefore, the Mayor will work with partners to continue to develop a comprehensive network of frequent, high-quality bus routes.

Policy T4 Assessing and mitigating transport impacts

- A Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- B When required in accordance with national or local guidance,¹⁸³ transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.¹⁸⁴
- C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.
- D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will

183 <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>

184 <https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants>

	be contingent on the provision of necessary public transport and active travel infrastructure.
E	The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.
F	Development proposals should not increase road danger.

- 10.4.1 It is important that the impacts and opportunities which arise as a result of development proposals are identified and assessed so that appropriate mitigations and opportunities are secured through the planning process. **Transport assessments** are therefore necessary to ensure that planning applications can be reviewed and assessed for their specific impacts and for their compatibility with the Healthy Streets Approach. Consideration of the potential impacts on internationally important wildlife sites should also be assessed, where required.
- 10.4.2 Transport assessments should include an assessment of demand arising from personal travel as well as from potential servicing and deliveries, taking into account the impacts both on all modes of transport including walking and cycling, and on streets as social spaces. For developments of strategic importance (development proposals that are referable to the Mayor), applicants are strongly advised to engage early with Transport for London through **the pre-application process** in order to ensure that all necessary elements are covered.¹⁸⁵
- 10.4.3 It is important that development proposals **reduce the negative impact of development on the transport network** and reduce potentially harmful public health impacts. The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. The other main impacts on public health relate to air quality, road danger, noise, and severance. The phasing of development, and the use of travel plans and freight strategies, may help reduce negative impacts and bring about positive

185 <https://tfl.gov.uk/info-for/urban-planning-and-construction/>

outcomes. Where adverse transport impacts have been identified from development proposals, mitigation will be sought in the form of financial contributions – to improve network service levels for example – or through directly providing infrastructure such as additional bus stops and street improvements.

- 10.4.4 New development that will give rise to significant numbers of new trips should be located in places well-connected by public transport, with capacity adequate to support the additional demand, or where there is a realistic prospect of additional access or capacity being provided in time to meet the new demand. The ability to absorb increased travel demand through active travel modes must also be considered. **Funded proposals by applicants to improve transport access, capacity or connectivity are encouraged.**

Policy T5 Cycling

- A Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:
- 1) supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure
 - 2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.
- B Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.¹⁸⁶ Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

186 The London Cycling Design Standards can be found in TfL's online Streets Toolkit at <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2>

C	Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.
D	Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.
E	Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.
F	Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

Table 10.2 - Minimum cycle parking standards*

- 10.5.8 **Short-stay cycle parking** must be available for shoppers, customers, messengers and other visitors, and must be convenient and readily accessible. It must have step-free access and be located within 15 metres of the main entrance wherever possible.
- 10.5.9 The provision of **space for folding bicycles** is generally not an acceptable alternative to conventional cycle parking. An exception may be applied in office developments in the CAZ, where the location of rail termini lends itself to greater levels of folding bicycle use. This should only be applied for up to 10 per cent of long-stay spaces and where the full provision could not otherwise be provided. Provision of cycle hire caters for a different market of cyclist and also should not be accepted in lieu of cycle parking.
- 10.5.10 Where standards are based on floorspace, these have been calculated on the basis of the level of demand and potential growth in relation to Gross External Area (GEA). This calculation already takes into account that not all of the area covered by GEA will generate cycling trips.

Policy T6 Car parking

- A Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.
- B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.
- C An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.
- D The maximum car parking standards set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.

- E Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking to Policy T6.5 Non- residential disabled persons parking.
- F Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all use classes.
- G Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6.1 Residential parking, Policy T6.2 Office parking, Policy T6.3 Retail parking, and Policy T6.4 Hotel and leisure uses parking. All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.
- H Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.
- I Adequate provision should be made for efficient deliveries and servicing and emergency access.
- J A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.
- K Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential use classes in any part of London.

L Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.

- 10.6.1 To manage London's road network and ensure that people and businesses can move about the city as the population grows and housing delivery increases significantly, new parking provision must be carefully controlled. The **dominance of vehicles on streets** is a significant barrier to walking and cycling, reduces the appeal of streets as public places and has an impact on the reliability and journey times of bus services. Reduced parking provision can facilitate higher-density development and support the creation of mixed and vibrant places that are designed for people rather than vehicles. As the population grows, a fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use. Implementing the parking standards in this Plan is therefore an essential measure to support the delivery of new housing across the city. In some areas, it will be necessary for boroughs to introduce additional parking controls to ensure new development is sustainable and existing residents can continue to park safely and efficiently.
- 10.6.2 **Maximum standards for car parking** take account of PTAL as well as London Plan spatial designations and use classes. Developments in town centres generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people living there. Opportunity Areas offer the potential to coordinate new transport investment with development proposals to embed car-free or car-lite lifestyles from the outset. Differences in car use and ownership between inner and outer London are recognised, with trip distances and trip patterns sometimes making walking and cycling difficult in outer London.
- 10.6.3 The approach to parking in **outer London Opportunity Areas** should be set out in Opportunity Area Planning Frameworks, complementing the OA mode share target.¹⁸⁷ Through OAPFs, parking provision can vary within an

187 As required by the Mayor's Transport Strategy

SPATIAL STRATEGY

POLICY SV1 - GREAT WEST CORRIDOR PLAN

Our approach

We will work with residents and stakeholders to explore and identify the potential capacity for additional employment-led mixed use development along the Great West Corridor and coordinate its regeneration.

We will achieve this by

Progressing a partial Local Plan review which will:

- (a) Identify the extent of the Great West Corridor;
- (b) Determine the location and sustainable quantum of additional employment and residential development above existing Local Plan levels for implementation through new site allocations;

(c) Coordinate the delivery of public and private investment in transport infrastructure throughout the Great West Corridor as identified in policy EC1;

(d) Progress the designation of the Great West Corridor as an Opportunity Area through the review of the London Plan;

(e) Support the growth of the media and digital sectors in line with the London Plan's identification of the area as a Strategic Outer London Development Centre;

(f) Improve linkages with Brentford town centre through public realm enhancements and improved connectivity and access to amenities and facilities for the businesses and workforce in the area;

(g) Identify sites with suitability for tall buildings following further urban design work;

(h) Review existing employment designations, including the Locally Significant Industrial Sites, through an Employment Land Review and other appropriate evidence;

(i) Explore opportunities for mitigating and reducing the impact of noise and air pollution for existing and future residents;

(j) Review local infrastructure requirements through the preparation of an area-specific Infrastructure Delivery Plan; and

(k) Proceed with initial informal public consultation commencing before the end of 2015 and a target for adoption by the end of 2018.



TOWN CENTRES

POLICY TC1 - TOWN AND NEIGHBOURHOOD CENTRE NETWORK

Our approach

We will maintain a network of successful town and neighbourhood centres, each with their own role and function, to provide the shops, services and facilities needed to meet the needs of the borough's population.

We will achieve this by

- (a) Recognising the borough's network of town and neighbourhood centres as set out in Table TC1.1, consisting of four town centres in Hounslow (a Metropolitan Centre), Chiswick (a Major Centre), and Brentford and Feltham (District Centres), supported by seven large neighbourhood centres in Hounslow West, Bedfont, Isleworth, Cranford, Hanworth, Heston and Old Isleworth, and 36 small neighbourhood centres; and
- (b) Supporting development and initiatives that promote the borough's town centres, to ensure they fully meet their position in the town centre network and to enable them to change and evolve, and take forward the council's regeneration objectives.

We will expect development proposals to

- (c) Be located appropriately in the context of the town and neighbourhood centre network, consistent with Policy TC3; and
- (d) Be of a scale and type that is appropriate in the context of the town or neighbourhood centre, consistent with Policy TC4 and Policy TC5.



TOWN CENTRES

POLICY TC3 - MANAGING THE GROWTH OF RETAIL AND OTHER MAIN TOWN CENTRE USES

Our approach

We will support the council's regeneration objectives by directing the growth of retail uses to the borough's town centres, making the most of their accessibility and maximising the opportunity for business opportunities and linked trips. Other town centre uses will also be directed to these locations, with Hounslow and Brentford being the focus of this growth in the short to medium term, based on the identified needs of these centres.

We will achieve this by

- (a) Directing proposals for retail floorspace and other main town centre uses (as defined in the NPPF) to the borough's four town centres, and considering proposals in other locations based on sequential and impact assessments;
- (b) Directing large scale retail development to primary shopping areas or other allocated sites within town centres;
- (c) Requiring impact assessments where development of over 500sqm of retail or 2,500sqm of other main town centre use floorspace is proposed outside of the borough's four town centres;
- (d) Allocating sites to meet the borough's retail needs; and
- (e) Supporting small scale retail development in identified neighbourhood centres.

We will expect development proposals to

- (f) Seek to locate in one of the borough's four town centres where retail floorspace or other main town centre uses are proposed;
- (g) Where development is proposed outside of town centres, proposals should demonstrate through a sequential assessment

that suitable locations within town centres are not available; followed by edge-of-town centre sites and large neighbourhood centres; with small neighbourhood centres then considered for smaller proposals that are suitable to the proportions of the centre. Only then should out-of-centre sites be considered, and these should be accessible and well connected to town centres;

(h) Demonstrate that the effect of the proposal, either individually or cumulatively, on the vitality and viability of existing town centres has been considered, through the preparation of an impact assessment where development of over 500sqm of retail or 2,500 sqm of other main town centre use floorspace is proposed outside of the borough's four town centres;

(i) Demonstrate that units are accessible to people with impaired mobility and pushchairs, consistent with the Mayor of London's Accessible London: Achieving an Inclusive Environment SPG; and

(j) Demonstrate that local context and character have been considered in terms of the design of shop fronts and the wider appearance of development.

ECONOMIC DEVELOPMENT

POLICY ED2 - MAINTAINING THE BOROUGH'S EMPLOYMENT LAND SUPPLY

Our approach

We will consolidate the London Borough of Hounslow's major industrial and office sites to secure the continued major representation of international companies, business headquarters and SMEs within the borough, and to ensure that the supply chain opportunities created by Heathrow Airport are retained within the borough.

We will achieve this by

- (a) In accordance with the London Plan, protecting designated Strategic Industrial Locations (the Great West Corridor Industrial Business Park, Transport Avenue Preferred Industrial Location and North Feltham Trading Estate Preferred Industrial Location) and designated Locally Significant Industrial Sites, as identified on the Policies Map
- (b) Setting the monitoring benchmark for the loss of industrial land to 6ha to ensure that an adequate supply of industrial capacity is

maintained in the borough throughout the plan period. The loss of industrial land will be regularly monitored against this figure; and

- (c) Managing and protecting Key Existing Office Locations as identified on the Policies Map namely the borough's four town centres (Hounslow, Chiswick, Brentford and Feltham), Chiswick Business Park, Bedfont Lakes and sections of the Great West Road.

We will expect development proposals to

- (d) Provide an assessment demonstrating that development proposals do not compromise the objectives of the SIL or LSIS designations and/or accord, where relevant, with the objectives of the Great West Strategic Outer London Development Centre;
- (e) Submit the following information where a loss of B1a, B1b, B1c, B2 or B8 or similar employment uses is proposed outside of SILs and LSISs:

- i. Evidence of active marketing of the site for employment uses for a period of at least two years in Key Existing Office Locations or for a period of at least one year in other locations;
 - ii. An assessment demonstrating that the introduction of non-employment uses is necessary to achieve sufficient viability to deliver a development scheme. Preference will be given to the provision of new employment uses, followed by a mix of employment and non-employment uses. Proposals for non-employment uses will only be considered once the retention of employment uses has been shown to be unviable; and
 - iii. Evidence that surrounding employment uses/ sites will not be undermined;
- (f) Facilities that support and enhance employment uses such as a workplace crèche or café may be acceptable where they are of a small scale ancillary to the overall employment function of the site.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

Our approach

We will seek to maximise the supply of housing in the borough to meet housing need in a manner that is consistent with sustainable development principles and is built at a rate that will exceed the London Plan annualised completion targets to achieve at least 12,330 new homes between 2015 and 2030. We will seek new opportunities to augment this growth where new infrastructure investment creates opportunities for levels of growth hitherto found to be unsustainable.

We will achieve this by

- (a) Allocating sites of a range of different sizes and locations to ensure there is a resilient and flexible stock of opportunities for housing development that offers a choice of high quality homes;
- (b) Supporting proposals for new development and conversions on other sites, including small sites, in the context of the presumption in favour of sustainable development;
- (c) Encouraging the effective use of land by reusing previously developed land provided that it is not of high environmental value or in a use that is protected otherwise in the Local Plan;

(d) Investigating, collaborating and promoting new opportunities to augment housing delivery targets with sustainable development, including through the preparation of two partial plan reviews for the Great West Corridor and the west of the borough;

(e) Publishing information on the rate of housing completions and the trajectory of deliverable and developable housing supply against an annual monitoring target of 822 additional homes per year. In doing so we will regularly review the need for changes to the site allocations and policies impacting on housing supply as part of a housing implementation strategy;

(f) Recognising that an important contribution to housing supply will come from small infill sites throughout the borough, and requiring the design of these to respond to and reflect local context and character. In doing so we will monitor and manage the cumulative impact of development;

(g) Maintaining a presumption against the development of self-contained residential units within the curtilage of existing dwellings where the proposal would be in conflict with other policies in this plan;

(h) Working with developers to unlock blockages to development and seek to ensure necessary infrastructure is in place in a timely manner; and

(i) Re-considering development proposals in the context of the Local Plan where applications to renew unimplemented planning permissions come forward, and reviewing the need to review Local Plan site allocations in the later phases of the plan period in order to maintain a rolling supply of deliverable housing sites and infrastructure.

We will expect development proposals to

- (j) Have regard to the design standards of the development plan and have regard to related supplementary planning documents;
- (k) Be completed in balance with existing and planned infrastructure, and contribute to the provision of further infrastructure to achieve sustainable development and sustainable mixed communities;
- (l) Include clear information on the anticipated rate of completion of the proposed development, and to construct housing in the phasing anticipated; and
- (m) Provide a clear explanation of why development could not proceed in the case of applications to renew unimplemented planning permissions, and set out a programme of proposed works.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC2 - MAXIMISING THE PROVISION OF AFFORDABLE HOUSING

Our approach

We will maximise the provision of affordable mixed tenure housing on development sites and from all other sources of supply. We have set a strategic target that 40% of additional housing delivered across the borough between 2015 and 2030 be affordable.

We will achieve this through:

- (a) Seeking the maximum reasonable amount of affordable housing to be negotiated on a site by site basis on all sites with a capacity to provide ten or more homes (gross) with reference to the strategic borough-wide target of 40% of all new housing as affordable;
- (b) Employing a review mechanism upon partial or full completion of a development when financial viability assessments demonstrate that current market conditions will support less than 40% affordable housing;
- (c) Recognising that development proposals with a significant amount of existing floorspace will result in a lower CIL liability which could further enhance viability for the delivery of a greater proportion of affordable housing than would otherwise be achievable. Vacant Building Credit (VBC) will also be applied in this context whereby the Council will seek the maximum reasonable amount of affordable housing across areas of increased floorspace, recognising improvements in overall viability that may have been secured through the application of VBC on existing floorspace; and
- (d) Delivering and supporting the delivery of affordable housing through other sources of supply, such as local authority new builds, reuse of empty homes and various forms of specialist housing.

We will expect development proposals to

- (e) Provide an open book financial viability assessment and any supporting evidence to demonstrate the maximum provision of on-site affordable housing is being proposed on sites with a capacity for 10 or more homes, with reference to the 40% strategic affordable housing target as well as the impacts of existing floorspace through VBC and reduced CIL liability. Developers may also be asked to facilitate an independent viability assessment by a third party where requested by the council;
- (f) Provide affordable housing on-site, unless the council considers that such provision is not practical or feasible, in which case off-site provision or appropriate cash in-lieu payments may be considered in exceptional circumstances;
- (g) Deliver a mix of 60% affordable/social rented and 40% intermediate tenures on all qualifying sites; and
- (h) Provide an appropriate mix of both housing size and tenure in accordance with housing need as set out in Policy SC3.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC3 - MEETING THE NEED FOR A MIX OF HOUSING SIZE AND TYPE

Our approach

We will seek to meet local housing need by securing a mix of new housing type, size and tenure across the borough.

We will achieve this by

- (a) Seeking a mix of new housing to meet objectively assessed and evidenced local need, based on the latest and/or most specific available evidence, and applying the general housing need mix requirements summarised in Figure SC3.1;
- (b) Negotiating the housing mix requirements using the mix summarised in Figure SC 3.1 as the starting point for the consideration of all housing proposals, whether achieved through change of use, conversion or new development;
- (c) Using this mix as the basis of monitoring new development across the borough and in local areas, and possibly adjusting site mix requirements in the light of the results of this evidenced monitoring;
- (d) Promoting and supporting appropriate specialist housing to meet specific affordable housing needs, including sites for groups of people wishing to build their own home; and

(e) Recognising that new housing development completed each year is a relatively small part of the total housing stock in the borough, which will be adapted to meet housing needs with and without the need for express planning permission. Trends in the subdivision and change to the existing housing stock will be monitored, and aspects of these changes will be managed where necessary to help best meet housing need.

We will expect development proposals to

- (f) Provide a mix of new housing as summarised in the Figure SC 3.1, unless otherwise agreed with the council on the basis of evidence;
- (g) Include a schedule of housing accommodation size and tenure; and
- (h) Provide a unit of family accommodation at ground floor or with direct access to the external amenity space where sub-division of large family houses (>130sqm 'original' floor area) is proposed.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC4 - SCALE AND DENSITY OF NEW HOUSING DEVELOPMENT

Our approach

We will ensure the scale and density of new housing development balances the need to make efficient use of land and achieves high quality design and accessibility, whilst responding to and reflecting local context and character and protecting existing residents' amenity. Large-scale developments will be required to include a mix of land uses and spaces to help create a sense of place and community neighbourhood.

We will achieve this by

- (a) Optimising housing output, taking into account the policies for context and character, the design standards in the Local Plan and public transport accessibility on a case-by-case basis;
- (b) Applying the design standards contained within this Local Plan to ensure the delivery of high quality developments which will not compromise the amenity of existing and future residents; and
- (c) Having regard to the density ranges contained within the London Plan Policy 3.4 to help guide the design and scale of new housing developments. Notwithstanding this consideration, where opportunities to maximise housing densities at suitable larger sites in areas of good public transport accessibility exist or can be created, they should be explored where all other planning policies can be fully satisfied to achieve sustainable development.

We will expect development proposal to

- (d) Meet the design standards set out in Building Regulations and the Local Plan and expanded upon within detailed supplementary guidance documents, including but not limited to, demonstrating compliance with prevailing daylighting standards (BRE Guidance 2011) and habitable room window separation guidance; and
- (e) Respond to the Urban Context and Character Study, Conservation Area Appraisals, planning briefs, Neighbourhood Plan and other guidance prepared.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC5 - ENSURING SUITABLE INTERNAL AND EXTERNAL SPACE

Our approach

We will ensure new housing development contributes to improving the quality and design of housing in the borough. Developments will be required to be of the highest quality internally and externally, and meet the demands of everyday life for the intended occupants, whilst offering flexibility to meet changing needs and respect the principles of good neighbourliness.

We will achieve this by

- (a) Applying the minimum internal space standards for all new housing developments and residential conversions, as set out in the Nationally Described Space Standard;
- (b) Seeking that provision of private external space that is usable and affords privacy and security with regard to the benchmark external space standards set out in Figure SC5.2; and
- (c) Ensuring the delivery of a minimum 10% of new dwellings provide enhanced accessibility or adaptability where the local authority is responsible for allocating or nominating a person to live in that dwelling.

We will expect development proposals to

- (d) Demonstrate compliance with the Nationally Described Space Standard with a flexible approach taken to residential conversions to achieve heritage conservation objectives;
- (e) Demonstrate through a clear design rationale how the benchmark external space standards contained in Figure SC5.2 have been considered. The exact area and character of external amenity space will vary according to the size and use of the dwelling unit;
- (f) Show how the aspect, usability, sense of enclosure and prevailing pattern established by local character have been considered in external open space proposals to create sufficiently high quality living conditions. The arrangement of external amenity space across a site should also be carefully considered to ensure an appropriate balance of public, communal and private space. In family sized units, there should be direct and easy access to a good sized private garden;

- (g) Be in accordance with the London Plan where flatted developments are proposed. This requires the provision of a minimum 5sqm of private outdoor space for all 1 to 2 person dwellings, with an additional 1sqm for each additional occupant. Balconies should be designed as an integral part of the building's elevation to maximise a beneficial aspect, and avoid positions that result in unacceptable overlooking and loss of privacy to other units or existing nearby dwellings; and
- (h) Contribute to the achievement of other objectives in the Local Plan where development proposals compromise the delivery of elements of this policy.

CONTEXT AND CHARACTER

POLICY CC1 CONTEXT AND CHARACTER

Our approach

We will recognise the context and varied character of the borough's places, and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage.

We will achieve this by

- (a) Improving and promoting the appreciation of the character and qualities of the distinctive areas of the borough, by securing development that sensitively and creatively responds to an area's character and by refusing poor quality design;
- (b) Sustaining and conserving those areas which have a high quality, well established and coherent character that is sensitive to change;
- (c) Enhancing those areas which have a medium quality, mixed character and which would benefit from sensitive improvement and intervention;
- (d) Transforming those areas which have a low quality, poorly defined character and/or where an opportunity exists to establish a new coherent character, enhancing positive elements where they exist; and
- (e) Monitoring and updating the Urban Context and Character Study and ensuring the study informs any supplementary planning documents.

We will expect development proposals to

- (f) Have due regard to the Urban Context and Character Study and demonstrate how the proposal:
 - i. Responds to the design recommendations for each character area and urban type within which their development proposal is located.
 - ii. Responds to the wider context and history of the area, its communities, its natural landscape and its urban structure, form and function.
 - iii. Conserves and takes opportunities to enhance particular features or qualities that contribute to an area's character, e.g. mature trees.
 - iv. Provides opportunities to help form a new character or improve the poor aspects of an existing character that could benefit from enhancement; and
 - v. Responds to any local architectural vernacular that contributes to an area's character, for example bay windows.

CONTEXT AND CHARACTER

POLICY CC2 - URBAN DESIGN AND ARCHITECTURE

Our approach

We will retain, promote and support high quality urban design and architecture to create attractive, distinctive, and liveable places.

We will achieve this by

- (a) Ensuring proactive urban design forms an integral part of council development plans, programmes and processes, and prioritising design guidance for areas of change and intensification;
- (b) Working with applicants at an early stage (pre-application) to guide and shape the design of development proposals;
- (c) Reviewing built and proposed developments, decisions and advice to help raise design standards and awareness of the value of good design;
- (d) Working with housing providers to improve the design of estates as part of wider regeneration programmes;
- (e) Working with local communities to understand and improve the urban design of their areas through, for example neighbourhood plans; and
- (f) Using good practice guidance such as By Design, the Urban Design Compendium, the Mayor's Housing Design Guide, Mayor's Housing SPG, and Building for Life assessments.

We will expect development proposals to

- (g) Understand, integrate and where possible add to the natural landscape; including the topography, geology, existing features, landscape context, local flora and fauna and wider ecological setting of an area. Schemes should ensure that trees are suitably sited, protected during detailed design and construction, and provide amenity for the long term through effective maintenance arrangements;
- (h) Deliver the right land use mix, amount and density in the right places to support the rejuvenation of our town centres and the creation of healthy, diverse and varied places;
- (i) Create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate and feel safe during the day and night, with a particular focus on pedestrians and cyclists;
- (j) Function well in themselves and in their effect on surrounding areas, have a positive impact on the amenity of current and future residents, visitors and passers-by and help create Lifetime Neighbourhoods that foster social interaction and capital;

CONTEXT AND CHARACTER

POLICY CC2 - URBAN DESIGN AND ARCHITECTURE

(k) Respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings. The orientation of buildings and uses on sites to make best use of opportunities for passive design and access to daylight/sunlight should be considered;

(l) Provide a clear distinction between private, semi-private and public space, through an understanding of fronts and backs of buildings, ground floor uses, and continuity of street frontages and enclosure of space to help foster comfortable, usable and safe places;

(m) Provide a high quality, comfortable, safe and attractive public realm, well-integrated into its surroundings through using clear, well-defined boundary and building lines to address and animate the public realm;

(n) Ensure buildings and spaces are designed to stand the test of time and are easily adaptable and resilient to social, economic and technological change, and can accommodate movement and car parking in a safe and useable way;

(o) Promote and support contemporary architecture that responds intelligently to current and future lifestyles, needs and technology, whilst ensuring it's rooted in local context, at all scales;

(p) Promote low carbon design and incorporate energy efficiency measures that are themselves well integrated into the design and appearance of the development;

(q) Carefully consider external appearance, its composition and arrangement, through the use of high quality, durable materials and finishes and careful, considered detailing for building facades which add visual interest and richness to the street scene. A clear indication of how buildings are used and occupied should be presented, seizing opportunities for passive design wherever possible;

(r) Be designed to mitigate noise and air quality issues which significantly affect parts of the borough;

(s) Be designed so it is fully accessible to people with disabilities or impaired mobility;

(t) Provide adequate outlook, minimise overbearingness and overshadowing, and ensure sufficient sunlight and daylight to proposed and adjoining/adjacent dwellings; reduce reliance on single aspect dwellings, particularly if north facing, within noise bands C and D (as defined in the Noise Supplementary Planning Document) or containing 3 bedrooms or more; provide adequate levels of privacy and minimise direct overlooking through the careful layout, design and orientation of buildings and spaces; and

(u) Make well-designed provision for bicycles, and the acceptable storage of refuse, materials for recycling and composting and for convenient access for its deposit and collection in consultation with the council's waste services. Enclosures should be robust, well ventilated and attractively integrated with the building and screened for privacy and security.

CONTEXT AND CHARACTER

POLICY CC3 TALL BUILDINGS

Our approach

To contribute to regeneration and growth, we will support tall buildings of high quality in identified locations which accord with the principles of sustainable development.

We will achieve this by

- (a) Supporting tall buildings in Hounslow town centre;
- (b) Supporting a limited number of tall buildings in Feltham town centre;
- (c) Supporting a limited number of tall buildings in Brentford town centre. These should be carefully designed and sensitively placed so as not to have a significant adverse impact on the setting of, views from and between heritage assets including Royal Botanic Gardens Kew World Heritage Site, Syon Park and the Thames foreshore landscape. They should also respect and respond to the area's special townscape and heritage value;
- (d) Supporting tall buildings along sections of the A4 Golden Mile frontage. Specific sites will be identified in the Great West Corridor Plan subject to the delivery of strategic public transport improvements. These should be carefully placed so as not to create a wall of tall buildings, ensuring they relate sensitively to surrounding residential areas and do not

- have a significant adverse impact on the setting of, or views from heritage assets including Gunnersbury Park, Royal Botanic Gardens Kew World Heritage Site, Syon Park and Osterley Park;
- (e) Preserving the predominantly 2 to 3 storey (less than 10m) building heights across the rest of the borough with some limited scope for 4 to 6 storey (up to 20m) buildings/elements along main streets (for example London Road), to assist with way-finding and where the opportunity exists for higher density development;
- (f) Not seeking to replace existing tall buildings which are in inappropriate locations (assessed against the criteria of this policy) and not allowing them to be a justification for the provision of new ones;
- (g) Undertaking more detailed design analysis including a study to identify spatial sensitivities; and
- (h) Working with our partners, particularly Historic England and Royal Botanic Gardens Kew World Heritage Site.

CONTEXT AND CHARACTER

POLICY CC3 TALL BUILDINGS

We will expect tall building development proposals to

- (i) Be sensitively located and be of a height and scale that is in proportion to its location and setting, and carefully relate and respond to the character of the surrounding area;
- (j) Be of the highest architectural design and standards; be attractive, robust and sustainable;
- (k) Be of a scale that reflects their relevance and hierarchical importance when located within a grouping/cluster of tall buildings;
- (l) Be designed to give full consideration to its form, massing and silhouette, including any cumulative impacts, and the potential impact of this on the immediate and wider context;
- (m) Relate heights to widths of spaces to achieve comfortable proportions, and provide a positive edge to the public realm and a human scale through the careful treatment of ground floors and lower levels;
- (n) Provide for a comfortable and pleasant microclimate which minimises wind vortices and over-shadowing;

- (o) Provide for biodiversity within the building form and be sensitive to surrounding open spaces including waterways to ensure minimal impact;
- (p) Take opportunities to enhance the setting of surrounding heritage assets, the overall skyline and views;
- (q) Carefully consider the façade and overall detailing to ensure visual interest, vertical and horizontal rhythms, an indication of how the building is inhabited, internal thermal comfort and the visual break-up of the building visually at varying scales;
- (r) Use materials and finishes that are robust, durable and of the highest quality, with facades providing innate interest, variety and function;
- (s) Incorporate innovative approaches to provide high quality, usable, private and communal amenity space where residential uses are proposed; and
- (t) Comply with the requirements of the Public Safety Zone.



CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

Our approach

We will identify, conserve and take opportunities to enhance the significance of the borough's heritage assets as a positive means of supporting an area's distinctive character and sense of history.

We will achieve this by

- (a) Collating a borough-wide Heritage Strategy to guide a long-term, ambitious strategy for the continued conservation, enhancement and enjoyment of the significance of the borough's heritage assets, in consultation with the borough's local history societies and residents;
- (b) Conserving and taking opportunities to enhance the significance of the borough's network of designated and non-designated heritage assets and their settings, identifying new assets where appropriate and recognising the cumulative positive impact of heritage assets in a given area in consultation with the borough's local history societies and residents. We will use Article 4 directions where appropriate to enhance conservation of character or fabric;
- (c) Promoting heritage-led regeneration, particularly where this brings long term value and sense of place to development, such as in our town centres and along the Golden Mile. We will aim to secure the regeneration of heritage assets at risk, including those within Gunnersbury Park, Hanworth Park, Boston Manor House and the former Hounslow Powder Mills sites;

- (d) Working with Royal Botanic Gardens Kew World Heritage Site, London Borough of Richmond and Historic England to conserve and enhance the outstanding universal values of The Royal Botanical Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from this asset. This includes assisting in the implementation of the World Heritage Site Management Plan;
- (e) Promoting the appropriate re-use of historic buildings and supporting schemes that conserve the significance of, and provide the heritage asset with a sustainable, long-term use;
- (f) Working with our network of partners to ensure the borough's heritage is accessible, appreciated, valued and enjoyed by residents, workers and visitors;
- (g) Conserving and enhancing the strategic and local views identified in the Urban Context and Character Study that give the borough its character, visual richness and coherence; and by maintaining and updating a schedule of views; and
- (h) Conserving and enhancing the borough's beneficial and historic landmarks identified in the Urban Context and Character Study, which provide a strong visual and physical presence in the townscape.

CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

We will expect development proposals to

- (i) Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance;
- (j) Retain, conserve and reuse a heritage asset in a manner appropriate to its value and significance;
- (k) Demonstrate that substantial harm to or loss of a heritage asset is avoided, unless exceptional circumstances can be demonstrated, consistent with the NPPF;
- (l) Demonstrate that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (see Glossary), this harm will be outweighed by the public benefits of the proposal, including securing its optimum viable use; or
- (m) Have regard to any harm to, or loss of, the significance of a non-designated heritage asset, including from both direct and indirect effects. Non-designated heritage assets include locally listed buildings, Archaeological Priority Areas and areas of special local character.

Buildings and structures

- (n) In the case of alterations, extensions or changes of use of a heritage asset a proposal should demonstrate that:
 - i. It is in keeping with the character of the building and harmonious with its surroundings and the wider character of the area; and, with particular respect to listed buildings or identified aspects of locally listed buildings, it preserves their special architectural or historic character and any features they may possess;
 - ii. It is of a high quality design and sympathetic in terms of scale and form to the original building and in the use of materials and other details to the period and style of the original building;

- iii. Opportunities to mitigate or adapt to climate change through the re-use or adaptation are maximised as long as this is not to the detriment of important aspects of character;
- iv. That it maintains the character of interiors and retain internal features of interest including layouts, methods and means of construction where these are important;
- v. That the original use is no longer viable and the benefits of the proposed use are demonstrated and would be in keeping with the character of the area; and
- vi. That a record is made and submitted of features of interest found, to be maintained and extended during works. Sustainability and salvage aspects should be factored into proposals.

CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

Conservation areas

- (o) Any development within or affecting a Conservation Area must conserve and take opportunities to enhance the character of the area, and respect the grain, scale, form, proportions and materials of the surrounding area and existing architecture; and
- (p) Retain and reuse any building in a conservation area which makes or can be adapted to make a positive contribution to the character of the area. Where a building makes little contribution to the area, consent for demolition will not be given unless there are approved plans for redevelopment or reuse of the land which will conserve and enhance the character of the area. Sustainability and salvage aspects should be factored into proposals.

World Heritage Site

- (q) Conserve and enhance the internationally recognised Outstanding Universal Value of the Royal Botanic Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from the site.

Sites of archaeological importance

- (r) We will expect the development proposal to submit an Archaeological Evaluation Report if the proposal falls within or adjacent to an Archaeological Priority Area;
- (s) We may require that an on-site assessment by trial work (archaeological field evaluation) is carried out before any decision on the planning application is taken; and
- (t) We will require any nationally important remains and their settings to be preserved permanently in situ, subject to consultation with Historic England as the borough's archaeological adviser. If preservation in situ is required the development proposal will need to accommodate this in the design.

Scheduled ancient monuments

- (u) Conserve and enhance a scheduled ancient monument and its setting if affected. Proposals must assess and submit an evaluation report if the proposal affects a scheduled ancient monument.

Strategic and local views

- (v) Conserve and enhance any strategic or local views identified in the Urban Context and Character Study and undertake a visual impact assessment to demonstrate no adverse impacts on the designated view or on views from Royal Botanic Gardens Kew World Heritage Site.

Registered parks and gardens

- (w) Consider adding to the list and encouraging preservation and enhancement through appropriate management measures.

Listed Buildings at Risk

- (x) Continue to assist with Historic England's Register of Heritage at Risk, adding items where necessary but seeking their removal by developing a proactive strategy for working with owners to ensure the continued conservation of the significance of the boroughs heritage assets.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB2 - OPEN SPACE

Our approach

We will protect and enhance Local Open Space.

We will achieve this by

- (a) Designating and protecting Local Open Space as shown on the Policies Map, in line with the NPPF and the London Plan;
- (b) Protecting and enhancing Local Open Space, addressing deficiencies in quality, quantity and access;
- (c) Maintaining the supply of Local Open Space to meet the needs of the borough's growing population, by expecting on-site provision of publicly accessible open space, particularly in major new developments in areas of deficiency;
- (d) Encouraging the provision of an appropriate balance and mix of open space types specific to meet needs in different parts of the borough, with specific reference to increasing the provision of parks and gardens;
- (e) Protecting quiet and tranquil areas of Local Open Space that are relatively undisturbed by noise and are valued for their recreation amenity attributes; and
- (f) Working with partners, friends groups, other stakeholders and the general public to improve and enhance the quality of and access to Local Open Space.

We will expect development proposals to

- (g) Protect existing Local Open Space from development, especially where it would lead to a deficiency in publicly accessible open space, unless it satisfies the criteria for such development in the NPPF in that: it has been assessed as clearly surplus to requirements; or it would be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreational provision, the need for which clearly outweighs the loss;
- (h) Avoid the loss of or encroachment upon Local Open Space, or intrusion into an open aspect. Development ancillary to the open space use must preserve its predominantly open character; and
- (i) Enhance the provision of publicly accessible Local Open Space in the borough, especially in areas of open space deficiency as identified on an annual basis through Annual Monitoring Reports Major developments should achieve this through onsite provision wherever possible, particularly in areas of substantial change and intensification.



GREEN AND BLUE INFRASTRUCTURE

POLICY GB4 - THE GREEN INFRASTRUCTURE NETWORK

Our approach

We will protect and enhance the green infrastructure networks throughout the borough, particularly those identified as part of the Mayor of London's All London Green Grid. The network will be improved to maximise the diverse benefits and multiple functions, and improved public access to, and links between open spaces will be encouraged.

We will achieve this by

- a) Identifying and protecting the existing green infrastructure network, including the grid identified in the Mayor of London's All London Green Grid SPG;
- b) Working with partners to deliver projects that enhance and maximise the benefits of the green infrastructure network. We will also promote the development of new green chains and corridors where these can benefit local residents and biodiversity, and contribute to wider environmental resilience; and
- c) Promoting projects to improve access to the green infrastructure network and accessibility between open spaces, to form a network for sustainable travel, consistent with the council's Greenways and Quietways initiatives.

We will expect development proposals to

- (d) Make a positive contribution to the green infrastructure network by improving its quality, functions, linkages, accessibility, design and management;
- (e) Incorporating elements of green infrastructure on site to integrate into the wider network of green infrastructure, and assist in the greening of the borough. This may include provision of green roofs, sustainable drainage systems, trees, squares, plazas and pedestrian access routes; and
- (f) Demonstrate that there will be no significant adverse impact on the borough's green infrastructure.

We are taking this approach because

7.10 The green infrastructure network provides multifunctional benefits, including links to places both within and beyond the borough. These links encourage walking and cycling, and enable movement of wildlife. The green infrastructure network includes a number of parks, walkways and other spaces and within the borough, large parts of the green infrastructure network closely relate to the Blue Ribbon Network, particularly the River Thames, the River Brent and the River Crane. These are identified as green grid areas in the Mayor of London's All London Green Grid SPG, highlighting the diversity of the borough's green and blue landscapes and environments.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB7 - BIODIVERSITY

Our approach

We will protect and enhance the London Borough of Hounslow's natural environment and seek to increase the quantity and quality of the borough's biodiversity.

We will achieve this by

- (a) Permitting development only where it can be shown that significant adverse impact on biodiversity is avoided, mitigated, or as a last resort, compensated;
- (b) Protecting designated international, national and local nature conservation areas, as set in supporting facts, and supporting new designations;
- (c) Promoting the qualitative enhancement of biodiversity sites, including improvements to access, connectivity and the creation of new habitat;
- (d) Working with partners, including the Hounslow Biodiversity Partnership, the Crane Valley Partnership, the Brent Catchment Partnership and the Thames Landscape Strategy to improve conditions for biodiversity; and
- (e) Encouraging the greening of the borough, through landscaping and tree planting, and protecting existing trees through Tree Preservation Orders (TPOs).

We will expect development proposals to

- (f) Contribute to the greening of the borough, by incorporating green roofs and walls, landscaping, tree planting and other measures to promote biodiversity such as bat and bird boxes, through the preparation of ecological plans and strategies where major developments are proposed, thereby resulting in a gain for biodiversity in the borough; and
- (g) Contribute to the action plans set out in the Hounslow Biodiversity Action Plan.

We are taking this approach because

7.14 Despite being developed, the borough's significant open space, plus its location on the River Thames, provides the borough with diverse habitats and a rich wildlife resource. This includes 954ha of open space managed wholly or partly for nature conservation, with many other areas and the built environment also hosting incidental species and habitats. As well as hosting sites that are of importance to the local communities, the borough includes areas of nature conservation that have national, European and international protection, as set out in the supporting facts. The future development planned for the borough will place pressure on these habitats. However it also presents opportunities for the creation of new habitats and improvements to existing sites. The provision of new habitats should focus on priority habitats and should give consideration to native and priority species taking into account the species' adaptability to climate change.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB9 - PLAY SPACE, OUTDOOR SPORTS FACILITIES AND BURIAL SPACE

Our approach

We will protect and improve the provision of play spaces, outdoor sports facilities and burial spaces to meet the diverse needs of the borough's population now and in the future.

We will achieve this by

- (a) Promoting the provision of high quality play spaces that cater for a range of age groups and help meet the needs of the borough's growing child population;
- (b) Supporting high quality sports facilities to meet demands for a range of sports and active pursuits across the borough, where they are acceptable uses in accordance with policies GB1 and GB2;
- (c) Promoting the multifunctional use of existing open space for play and sports, including school sports facilities and playing fields;
- (d) Ensuring burial space is preserved to ensure availability of provision to meet the borough's burial needs now and in the future; and
- (e) Resisting the loss of play areas or outdoor sports facilities, including playing fields.

We will expect development proposals to

- (f) Be consistent with the open space and/or nature conservation designation of the land;
- (g) Avoid the loss of play areas, burial spaces or outdoor sports facilities, including playing fields, except in very special circumstances, as set out in the NPPF;
- (h) Ensure sports facilities retain the sense of openness. Where floodlighting can enable longer use of outdoor sports facilities, proposals should avoid unacceptable adverse impacts on local residents, biodiversity as set out in policy GB7 and/or the openness and setting of the open space;
- (i) Contribute to the provision of improved outdoor sports facilities, where possible; and
- (j) Contribute to the improvements or expansion of play spaces, and provide new play spaces where appropriate in accordance with the standards set out in the London Plan.

ENVIRONMENTAL QUALITY

POLICY EQ1 - ENERGY AND CARBON REDUCTION

Our approach

We will move towards being a low carbon borough, by minimising the demand for energy and promoting renewable and low carbon technologies.

We will achieve this by

- (a) Promoting opportunities to secure carbon reductions where development comes forward, including through a potential Community Energy Fund to provide for allowable solutions, or a local carbon offset fund to provide local low carbon projects;
- (b) Encouraging developments to incorporate renewable energy and low carbon technologies; and
- (c) Working with partners to identify opportunities for carbon reductions and encouraging the take-up of opportunities to improve the energy efficiency of the existing built environment.

We will expect development proposals to

All developments

- (d) Meet the carbon emission reduction requirements set out in the London Plan.

All major developments

- (e) Connect to, or extend, existing decentralised heating, cooling or power networks in the vicinity of the site, unless a feasibility or viability assessment demonstrates that connection is not reasonably possible. Where networks do not currently exist, developments should make provision to connect to any potential future decentralised energy network in the vicinity of the site, having regard to opportunities identified through the London Heat Map and area specific energy plans;
- (f) Evaluate the feasibility and viability of Combined Heat and Power (CHP) systems and, where appropriate, examine the feasibility of extending the system beyond the site boundary, where developments cannot immediately connect to an existing heating or cooling network; and
- (g) Where appropriate make a financial contribution to an agreed borough-wide programme for carbon reductions where required reductions cannot be achieved on-site.

We are taking this approach because

9.1 Reducing carbon emissions in response to climate change is an established policy priority at the national, London-wide and local levels. The government's policy is for an 80% reduction in greenhouse gas emissions by 2050, and the London Plan seeks to achieve an overall reduction in the city's carbon dioxide emissions of 60% below 1990 levels by 2025. The council is seeking to achieve carbon reductions, both in its operations and across the borough. The built environment, including both new and existing buildings, is central to achieving these targets; this is particularly true for the borough, which is already developed and preparing for further growth. Energy consumption in the borough's housing stock alone is currently the second largest source of carbon emissions, accounting for 33% of the total.

ENVIRONMENTAL QUALITY

EQ2 - SUSTAINABLE DESIGN AND CONSTRUCTION

Our approach

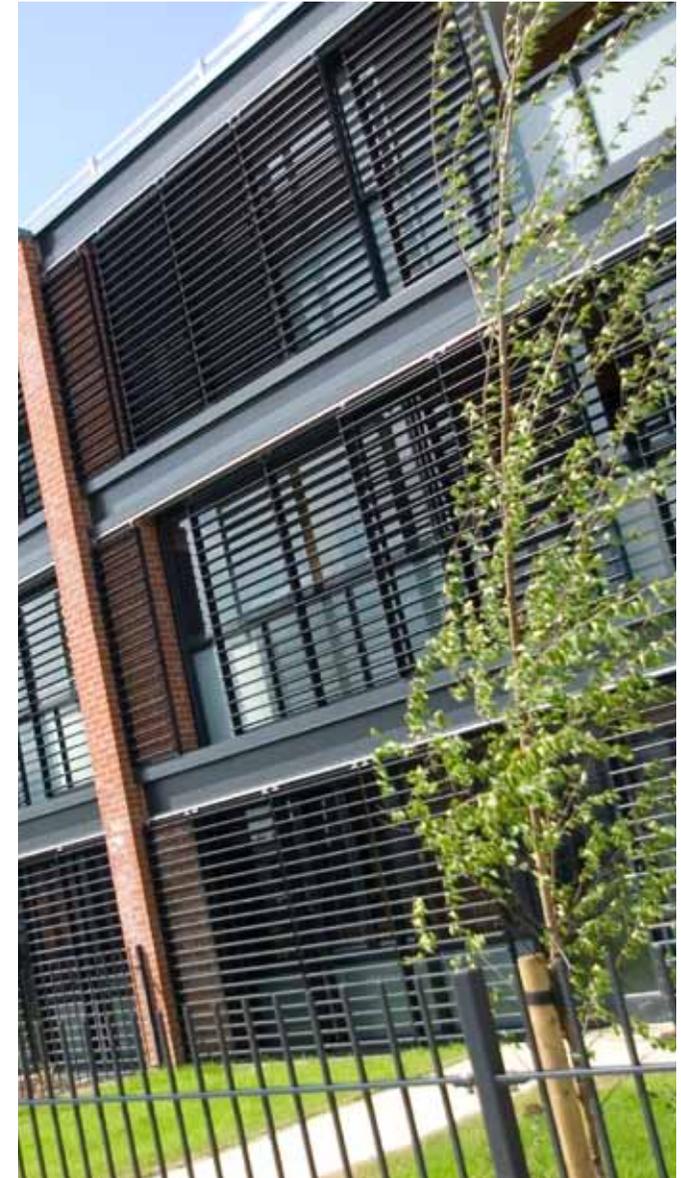
We will promote the highest standards of sustainable design and construction in development to mitigate and adapt to climate change.

We will achieve this by

- (a) Promoting sustainable design and construction, consistent with the principles established in the London Plan;
- (b) Using national standards for sustainable design and construction to assess environmental credentials of developments, and requiring schemes to meet specified levels as minimum; and
- (c) Encouraging the take-up of opportunities to improve the resource efficiency of existing homes and buildings through refurbishment to retrofitting, including through working with partner agencies such as Historic England to secure improvements in heritage assets.

We will expect development proposal to

- (d) Incorporate established principles for sustainable design and construction as set out in the London Plan, including passive solar design, water efficiency standards, sustainable drainage, the reuse and recycling of construction materials, green roofs and urban greening;
- (e) Be assessed against the standards for sustainable design and construction set out in Table EQ2.1 and submit relevant documentation to demonstrate that minimum specified levels are met or meet any national standards that subsequently supersede these; and
- (f) Prepare a sustainability statement, where major developments are proposed.



ENVIRONMENTAL QUALITY

POLICY EQ3 - FLOOD RISK AND SURFACE WATER MANAGEMENT

Our approach

We will ensure that flood risk is reduced by ensuring that developments are located appropriately and incorporate any necessary flood resistance and resilience measures. In addition, surface water will be managed through an increased emphasis on sustainable drainage.

We will achieve this by

- (a) Using the sequential and exceptions tests to inform planning decisions in flood risk areas to ensure inappropriate development is avoided;
- (b) Promoting improved surface water drainage across the borough, by working with partners to identify, manage and reduce the risk of surface water flooding;
- (c) Promoting the opening up of river corridors and making space for water through the creation of buffer zones to water courses and increasing floodplain connectivity;
- (d) Working with partners to ensure the provision and maintenance of flood defences, in line with the Infrastructure Delivery Plan;
- (e) Encouraging the take-up of opportunities to improve flood resistance and resilience in the borough's existing built environment, including drainage improvements, flood guards and raising electrical sockets and other vulnerable fittings; and
- (f) Working with the Environment Agency to implement actions of the Thames Estuary 2100 plan.

We will expect development proposals to

- (g) Prepare flood risk assessments, consistent with the requirements of the Environment Agency and the Strategic Flood Risk Assessment, and apply the sequential approach within site boundaries to ensure flood risk is further decreased;
- (h) Incorporate necessary flood resistance and resilience measures, including ensuring that adequate flood defences are in place and maintained through the lifetime of the development;
- (i) Incorporate sustainable drainage systems and avoid non-permeable hard standings with the aim of achieving greenfield runoff rates and being consistent with the Surface Water Management Plan; and
- (j) Where adjacent to the River Thames, demonstrate that they will not preclude future rising or set back of the defence as identified in the Thames Estuary 2100 Plan to ensure adequate flood protection for the lifetime of the development.

ENVIRONMENTAL QUALITY

POLICY EQ4 - AIR QUALITY

Our approach

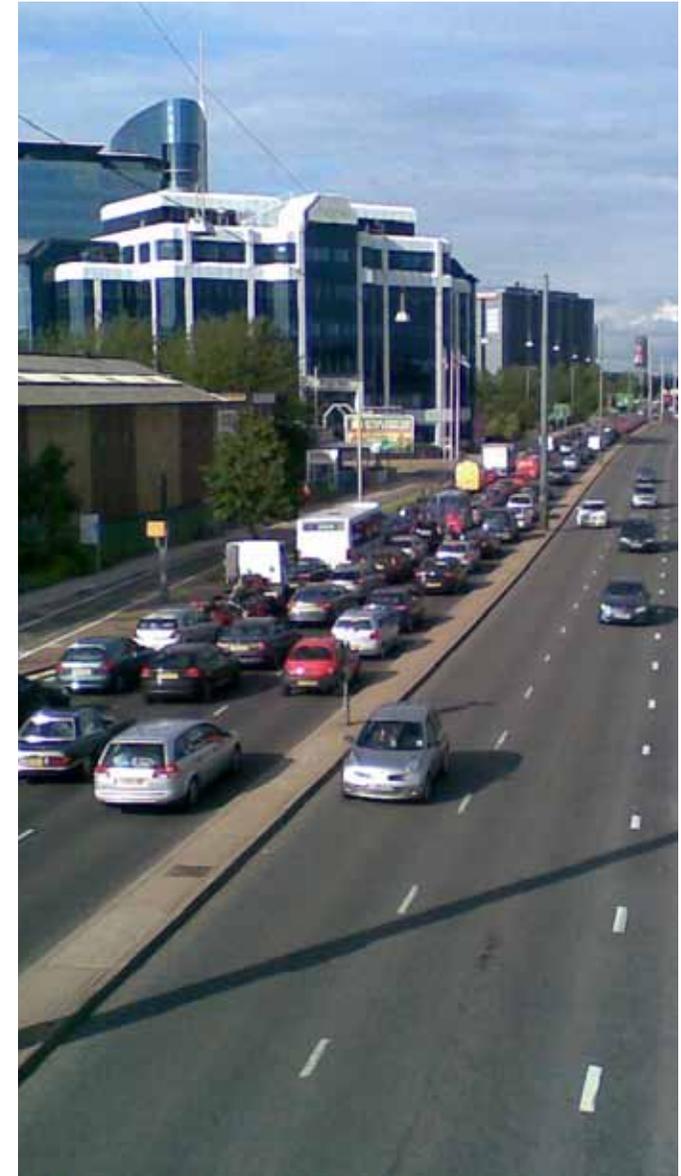
We will seek to reduce the potential air quality impacts of development and promote improved air quality conditions across the borough, in line with the Air Quality Action Plan.

We will achieve this by

- (a) Assessing the potential air quality impacts of development proposals;
- (b) Encouraging air quality-sensitive development to be located in the most appropriate places, and requiring mitigation measures to minimise adverse impacts on end users through planning conditions; and
- (c) Ensuring that development does not exacerbate existing air pollution and wherever possible improves air quality, by promoting development that reduces and limits exposure to emissions through on-site mitigation and is 'air quality neutral', and through promoting sustainable design and seeking developer contributions where appropriate, consistent with the London Plan, the Mayor's Air Quality Strategy and the National Air Quality Strategy.

We will expect development proposals to

- (d) Carry out air quality assessments where major developments or change of use to air quality sensitive uses are proposed, considering the potential impacts of air pollution from the development on the site and neighbouring areas, and the potential for end users to be exposed to air pollution, consistent with requirements established in the Air Quality SPD, the London Plan and in government and European policy are met; and
- (e) Incorporate mitigation measures where air quality assessments show that developments could cause or exacerbate air pollution, or where end users could be exposed to air pollution.



ENVIRONMENTAL QUALITY

POLICY EQ5 - NOISE

Our approach

We will seek to reduce the impact of noise from aviation, transport and noise-generating uses, and require the location and design of new development to have considered the impact of noise, and mitigation of these impacts, on new users and surrounding uses according to their sensitivity.

We will achieve this by

- (a) Assessing the potential noise impacts of development proposals where they are located near to noise-sensitive uses (such as housing) or existing sources of noise;
- (b) Directing noise-sensitive development to locations outside those areas identified where noise exposure is likely to cause adverse effects in terms of public health and well-being and children's cognitive learning in schools;
- (c) Ensuring noise-sensitive development is protected against existing and proposed sources of noise through careful design, layout and use of materials, adequate insulation of the building envelope (including both internal/external walls and ceilings), as well as protecting external amenity areas;

(d) Encouraging the uptake of measures to decrease noise nuisance in the built environment, including working with Heathrow Airport to improve conditions for households and other noise-sensitive uses exposed to high levels of noise, consistent with the Aviation Policy Framework; and

(e) Considering the designation of Quiet Areas and identifying and protecting areas of tranquility which have remained relatively undisturbed by noise and are valued for their recreational and amenity value for this reason.

We will expect development proposals to

- (f) Carry out noise assessments where major schemes or a change of use to a more noise-sensitive use are proposed, detailing on site noise levels both internally and in any external amenity space, and the potential impact of the development on surrounding uses;
- (g) Minimise noise disturbance from adjoining uses by incorporating sound insulation or alternative forms of noise barrier, using appropriate materials and arranging and locating rooms appropriately (such as through stacking rooms of similar use above/adjacent to each other), including where conversions or change of use are proposed;

(h) Ensure that noise mitigation measures are implemented, to demonstrate compliance with British Standard BS8233: 2014 - Guidance on sound insulation and noise reduction for buildings, as appropriate;

(i) Demonstrate that new plant and machinery (including ventilation) do not harm the amenity of neighbouring properties and generate noise level that is at least 10dB below the background noise levels; and

(j) Be located outside of the 69 dB LAeq 16hrs noise contour of Heathrow Airport where noise-sensitive uses (i.e. residential, nursing/care homes, schools/educational establishments, hospitals/healthcare facilities) are proposed, consistent with Section 2 of the International Civil Aviation Organisation (ICAO) Balanced Approach to Aircraft Noise Management which directs residential developments outside this contour.

ENHANCING CONNECTIVITY

POLICY EC1 - STRATEGIC TRANSPORT CONNECTIONS

Our approach

We will work with partners to secure investments to existing and future strategic transport connections, including London Underground, rail, bus, and cycle and highway services. These enhancements will maximise the borough's regeneration potential and support growth whilst also helping achieve our environmental objectives.

We will achieve this by

- (a) Supporting planned upgrades to the Piccadilly and District lines;
- (b) Promoting the development of rail connectivity between Southall (including Crossrail) and Brentford;
- (c) Promoting the development of the proposed rail connection from Hounslow station to Willesden Junction via Old Oak Common, with services calling at Isleworth, Syon Lane and Brentford;
- (d) Promoting improved bus services, particularly serving growth areas and the Golden Mile;

- (e) Supporting improved access to the Piccadilly line, including introduction of a permanent stop at Turnham Green and improved links between the line and the Golden Mile growth corridor;
- (f) Supporting improved access to Heathrow Airport through new southern rail access;
- (g) Supporting improvements to rail services on the South West Trains network, and in particular Sunday services;
- (h) Promoting new cycle networks, including a 'cycling spine' along the A315, with connecting Greenways and Quietways, and the provision of cycle parking at transport interchanges;
- (i) Promoting improvements to the highway network to best facilitate sustainable modes, including targeted junction improvements, targeted travel demand management (including trip banking where appropriate), signal optimisation and bridge works; and
- (j) Supporting initiatives to reduce the impact of road infrastructure in the built environment, including tunnelling proposals relating to the M4/A4.

We will expect development proposals to

- (k) Ensure that access to existing and future strategic transport connections is considered where appropriate, including through appropriate design; and
- (l) Contribute to improvements to the strategic transport network where appropriate, consistent with the Local Implementation Plan and Infrastructure Delivery Plan, and the findings of Transport Assessments.

ENHANCING CONNECTIVITY

POLICY EC2 - DEVELOPING A SUSTAINABLE LOCAL TRANSPORT NETWORK

Our approach

We will secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being.

We will achieve this by

- (a) Promoting 'car-free' or 'low car' development where appropriate, as well as car clubs and car sharing schemes;
- (b) Promoting the active management of car parking and travel demand in the borough, particularly through the implementation of Controlled Parking Zones (CPZs) and restricting access to these zones to existing dwellings, and requiring developments to plan end-use in accordance with these measures;
- (c) Preparing site specific development briefs where strategic sites include existing car parks, to ensure that sufficient car parking is retained to meet local needs;

(d) Using the standards established in the London Plan for car parking, cycle parking, motorcycle parking, coach parking, and electric vehicle charging (or as updated by alterations to the London Plan). The London Plan specifies the maximum number of car parking spaces that developments should provide, having regard to the type of development and public transport accessibility. In suburban areas of low public transport accessibility the council may seek a provision of car parking at the maximum standard. The London Plan also specifies levels of cycle parking, however these are minimum standards and the council may seek a higher provision in certain circumstances; and

(e) Requiring proposals for vehicle crossovers to be consistent with the council's adopted policy on vehicle crossovers.

We will expect development proposals to

(f) Demonstrate they are located appropriately with regard to public transport accessibility and capacity, road capacity and access to good quality walking and cycling networks. Developments should provide a minimum number of cycle parking spaces and an appropriate maximum number of car parking spaces consistent with the standards in the London Plan;

(g) Demonstrate that adverse impacts on the transport network are avoided, including preparation of Transport Assessments for all major schemes, and providing contributions or improvements to transport networks;

(h) Demonstrate that sufficient public car parking remains or is re-provided in the area to serve local needs where there will be a reduction in off-street car parking. This could include consideration of available on-street car parking or involve the provision of an appropriate temporary facility. This should ensure that the development ultimately provides for existing local need, together with the resulting increase in demand arising from the development;

(i) Prepare Travel Plans in accordance with latest guidance from Transport for London and the council's '10 Point Guide' or any subsequently adopted guidance; and

(j) Incorporate design measures and facilities to promote cycling, in line with the London Plan.



GWC1

EMPLOYMENT GROWTH

KEY ISSUES

1. Great West Corridor is in competition with other existing and emerging office locations in Greater London; it needs to carefully position itself in the market to attract businesses. The perception of the Corridor as an area dominated by car use, with low levels of public transport accessibility and few services and amenities mean businesses may be hesitant to invest here. Current public transport infrastructure is at capacity and significant investment is required to attract businesses to this location
2. The area largely comprises secondary stock with significant vacancies in the office buildings. Developments including employment floorspace need to be both flexible and well located to support a mixed and vibrant place. The Corridor's success will depend on making the Corridor a more attractive place for employers and employees.
3. The delivery of appropriate floorspace for SMEs is difficult to secure and the management, design, flexibility and affordability of these spaces can present a challenge to traditional employment space.
4. The erosion of the Corridor's importance as an employment area due to inappropriate conversion of office to residential use through permitted rights, undermines its competitive advantage in terms of relative size, profile and offer, as well as affect its ability to benefit from business clustering and to support the viability of complementing uses.

OPTIMISING EMPLOYMENT GROWTH

Our approach

The Council will seek to provide a mix of employment spaces that are attractive for the entire business community in existing and potential growth sectors. It will cater for larger companies, small and medium sized enterprises, microbusinesses, as well as the large freelance workforce by working with developers and stakeholders to deliver a sustainable and robust local economy that promotes the Great West Corridor as a place for enterprise and innovation. Employment floorspace will be provided singularly in development or as part of a mixed-use format depending on location.

We will achieve this by:

- (a) Safeguarding the function, attractiveness and competitiveness of the Strategic Industrial Location (SIL) and Locally Significant Industrial Site (LSIS) in the Great West Corridor and its ability to support employment and economic functions by ensuring:
 - i. That proposals are comprised of SIL compliant broad industrial type uses;

- ii. That there is an increase, or at least maintain, employment densities;
- iii. That proposals retain and/or provide small business units;
- iv. Proposals minimise and mitigate any significant adverse impacts that development may have on surrounding land uses;
- (b) Supporting mix use employment and residential development along the Corridor particularly in areas where it is necessary to facilitate renewal and regeneration of employment land.
- (c) Supporting proposals for the intensification of employment sites and premises to provide at least 490,000 sqm of workspaces (offices, creative space and light industrial) in the area, providing at least 14,000 new jobs.
- (d) Supporting businesses of all sizes in the Corridor, in particular start-ups, small and medium- sized enterprises.
- (e) Working with affordable and shared workspace managers and providers to bring forward affordable and shared workspace as part of development proposals.

- (f) Supporting active uses including retail along the Corridor as shown in figure 4.2
- (g) Working proactively and positively with stakeholders to nominate the area as enterprise zone for investment.

Will expect development proposals to:

- (h) Ensure that there is no net loss of office floor space in Key Existing Office Locations (KEOL) or industrial B Use Class floor space in Locally Significant Industrial Site (LISIS) and Strategic Industrial Locations (SILs)
- (i) Demonstrate and ensure compatibility of uses when providing mixed use developments. Operation of businesses on site or on neighbouring sites must not be compromised by the introduction of non-employment uses.
- (j) Demonstrate a net increase in employment floor space within designated employment sites.

OPTIMISING EMPLOYMENT GROWTH (CONTINUED)

(k) Meet the following criteria where located within regeneration areas:

- i. Maximise the employment floorspace delivered on the site. Residential and other non – employment uses will be permitted where their provision is appropriate to facilitate the redevelopment of employment land and promote regeneration of the site/area.
- ii. Demonstrate that the proposed development will re-provide existing employment floorspace or increase the floorspace on site.
- iii. Negotiate a proportion of small, micro and/or affordable workspace or contributions towards these, from major non-residential developments. Evidence must be submitted demonstrating agreement to lease the workspace to a Council approved Workspace Provider for at least 10 years. If on site provision is not possible, financial contributions for equivalent off-site provision will be required.

IMPLEMENTATION

1. The Council will play an active role in relevant local economic partnerships and other sub-regional partnerships to create a clear vision and provide a strong voice for outer London’s economic development and infrastructure needs;
2. The Council will proactively work with the land owners, developers and other development partners to facilitate and promote a modern 21st century business hub
3. The Council encourages the provision of additional employment floorspace to meet demand and contribute to delivering the objectives of the preferred spatial policy

WE ARE TAKING THIS APPROACH BECAUSE:

4.11 The Employment Land Review (ELR) (2016) identifies the need for additional office provision in the Borough. It states that the Council should identify land to accommodate 150,000sqm additional office space above existing commitments. Following the construction of a third runway at Heathrow the ELR predicts that this need would become even more pressing with a requirement for a further 96,000sqm of office floor space.

4.12 The ELR states that the highest demand for office space is focused around the provision of ‘A Grade’ office space in campus style environments. In addition to this primary requirement, the ELR identified a strong a need for small to mid-size offices in the TV triangle and around Chiswick. This centres on a demand for modern, flexible and affordable workspace. However, it is unclear whether this type of space could be delivered in such a competitive location without compromising viability.

4.13 Smaller, less profitable businesses in the emerging sectors have difficulty finding affordable space in Hounslow, and may be priced out, so they generally locate in cheaper parts of London. The ELR suggests that Council may consider an appropriate response, such as to provide or subsidise accommodation for SMEs in the sector,

GWC2 HOUSING

KEY ISSUES

1. Greater London Authority (GLA) forecasts anticipate Hounslow's population will grow in coming decades. Recent population projections show Hounslow's population increasing by 54,120 people or 20% between 2015 and 2035 (Source: GLA, 2014 round population projections – using an average of mid and long term trends).
2. Supply and demand figures suggest there is a gap between the need for housing in Hounslow and the supply of developable land, reinforcing the need to ensure appropriate development sites suitable for planning are identified and brought forward.
3. Residential development is a threat to the commercial activity in the area. There are currently many empty office buildings that risk being converted to residential. This would dilute the commercial function of the area.
4. Great West Corridor has been identified as a potential 'Opportunity Area'(OA) or an 'Intensification Area' which typically is brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility or an Intensification Area which are areas of brownfield land with significant capacity to accommodate new employment and residential development supported by existing or proposed public transport improvements.
5. New housing to support the viability of local facilities and uses and bring investment in community infrastructure and the public realm.
6. Meeting the demand for housing in particular affordable housing is a challenge in the context of infrastructure requirements and viability.

OPTIMISING HOUSING GROWTH

Our approach

We will seek to optimise the supply of housing in appropriate locations in the Great West Corridor and to support commercial uses to help meet the Borough's objectively assessed need. We will seek to support the provision of a wide range of good quality housing types and tenures, served by a range of appropriate social and physical infrastructure, jobs and a vibrant mix of uses that bring footfall and animation, especially around transport nodes. Housing will be principally supported in a mixed-use format only.

We will achieve this by:

- (a) Delivering and focusing new homes in areas identified in the Places Policies and site allocations for mixed use development supported by the appropriate social and physical infrastructure, jobs and services.
- (b) Determine the location and sustainable quantum of additional employment and residential development above existing Local Plan levels for implementation through new site allocations;

The Council will expect development proposals to:

- (c) Seek to contribute to the delivery of at least a minimum target of 5,200 sustainable new homes over the plan period whilst supporting the creation of mixed, balanced, sustainable and vibrant communities that deliver a target of 40% as affordable housing from development in line with adopted Local Plan Policy SC2.
- (d) Focus and prioritise new homes in places identified for regeneration and growth such as in the West Area with a minimum target of 2,000 homes; the Central Area with a minimum target of 790 homes; and the East Area with a minimum target of 2300 new homes.
- (e) Make effective and efficient use of land by promoting higher density development in highly accessible locations particularly around transport nodes and in accordance with the Places Policies.
- (f) Be of a mixed-use format, and provide a mix of housing types and tenures to meet current and future housing need and providing a variety of housing products in the market and affordable tenures.

- (g) Promote and consider in a positive manner residential development identified in the Places policies and on designated allocated sites.



GWC3

DESIGN AND HERITAGE

KEY ISSUES

1. The Great West Corridor is fragmented and comprises of a series of disjointed and poorly connected sub-areas. The area does not present a strong and positive identity as a desirable business location, and lacks a clear identity and sense of place.
2. Although there are no Conservation Areas within the Great West Corridor itself, there are many in close proximity. The World Heritage Site of Royal Botanic Gardens, Kew includes Grade I and II Listed Buildings and Scheduled Monuments is located over the River Thames, a short distance from the corridor. The Great West Corridor sits in the backdrop of these sensitive views. Therefore, development, especially of taller buildings, will need to have due regard to their impact on local heritage assets and their setting.
3. The high occurrence of existing digital advertisements on the elevated section of the M4 together with other visual stimuli from road signs, buildings, and long rooftop views, means that the M4 is visually cluttered. There is evidence that visual clutter has an increased potential for driver distraction that could lead to poorer vehicle control, especially for older drivers (Austroads, Impact of Roadside Advertising on Road Safety, 2013).
4. The area is severed from other areas and from itself, with both the M4 and A4 and the railway serving as barriers to movement. Additionally, there are only a limited number of crossing points over these routes. This problem is further exacerbated by the pattern of commercial development along the A4 corridor, which largely comprises of inward looking estates with limited pedestrian or vehicular connections between them and the wider area beyond.

DESIGN AND HERITAGE

Our approach

This Plan seeks to create a strong sense of place and identity for the Great West Corridor. Through a strong urban design-led approach the Plan seeks to knit the Great West Corridor well, into its surroundings, and to provide a comprehensive approach to managing new development. In addition to facilitating appropriate development, the plan also seeks to protect and enhance heritage assets within and adjacent to the Corridor, through establishing a coherent and high quality environment with architecturally significant, well designed landmark buildings and features along the M4 and A4 corridors, that create a memorable journey for those visiting or travelling through it and for those living and working within it.

We will achieve this by:

- (a) Working with developers and partners to establish a series of interconnected local places with their own strong characters and identities that build on their strengths, heritage and special features, as well as distinctively express their role and function,

through the scale and form of buildings, the quality of open spaces and the mix of their uses and activities.

- (b) Making best use of redevelopment opportunities whilst respecting and enhancing the area's distinctive characters and historic environment.
- (c) Supporting Heritage trails and other community-led initiatives that aim to celebrate and enhance the awareness of the area's history and foster its identity and the sense of belonging.
- (d) Promoting positive enhancements to the quality of the public realm with well-designed and generous pavements, landscaping, tree planting, a consistent palette of materials, furniture, signage and lighting, as well as enhancements to the underside of the elevated M4.
- (e) Supporting the creation of public squares at key locations which can help deliver a strong sense of place to the area with a welcoming and vibrant character that offer respite from the busy A4, M4 and railway corridors.

- (f) Creating environments that are inclusive and follow Secured by Design principles such as ensuring spaces are well lit, overlooked and feel safe at different times of the day and in the evening.

The Council will expect development proposals to:

- (g) Preserve and enhance heritage assets, bringing back into meaningful use where they have been left empty, abandoned or underused through enabling development.
- (h) Respond sensitively to adjoining, neighbouring and relevant heritage assets including Conservation Areas, Registered Parks and Gardens and Royal Botanic Gardens, Kew World Heritage Site. The Council will support proposals where Heritage buildings play a central role in the 'place making' of the Corridor and are given the prominence they deserve including reinforcing views that allow the appreciation of the asset and its special characteristics and features.

DESIGN AND HERITAGE (CONTINUED)

- (i) Protect and where possible enhance strategic and local views from Conservation Areas, Registered Parks and Gardens and Royal Botanic Gardens, Kew World Heritage site (Figure 4.4). Development proposals are expected not to have any significant impact and should reinforce the significance of these views where possible, especially views from and impact on surrounding heritage assets such as Gunnersbury Park, Royal Botanic Gardens, Kew World Heritage Site, Strand on the Green Conservation Area, Kew Green Conservation Area, Wellesley Road Conservation Area, the River Thames Corridor, and listed buildings, such as the Campanile of the London Museum of Water & Steam on Kew Bridge Road.
- (j) At the following locations, support the delivery of landmark buildings to create a strengthened and identifiable character for the corridor (Figure 4.4):
 - i. Chiswick roundabout (eastern gateway landmark) – to mark the eastern edge of the corridor and indicate the transition from the commercial and industrial uses of the corridor to the low rise residential uses to the east;
 - ii. Gillette Corner (an existing western gateway landmark) – to mark the western entrance to the corridor from the A4 and;
 - iii. The London Gateway where the elevated M4 Motorway merges with the A4 below, close to where it crosses Boston Manor Road – to signify arrival into inner London for those travelling on the M4 into the city from Heathrow and the West.
- (k) Support the delivery of corridor landmark buildings, to confer distinctiveness to the corridor when viewed from street level as well as dynamic views from along the M4, at the following locations (Figure 4.4):
 - i. The inside corner of the M4 at Capital Interchange Way, to respond to the bookend landmark at Chiswick Roundabout.
 - ii. The site adjacent to the proposed Lionel Road Station (at the junction of Lionel Road South and the A4), which would be subject to the delivery of the station.
 - iii. The corner of Ealing Road and the A4, as a focal point which responds to the existing Kew Eye building on the south side of this intersection and would respond appropriately to the existing residential uses to the north.
 - iv. The northern side of the A4 adjacent to the Shield Drive and Transport Avenue – to demarcate the location of the Golden Mile Station, subject to the delivery of the station. The design and height of each landmark site is required to be of exceptional quality and be designed so that the built form and general layout positively contribute to wayfinding and the character of the corridor.
- (l) The design and height of each landmark site will need to be of exceptional quality and design such that the built form and general layout will positively contribute to wayfinding and the character of the corridor and any associated heritage assets.

DESIGN AND HERITAGE (CONTINUED)

- (m) Demonstrate that a robust design review process has been undertaken that shows how the building impacts heritage (designated and undesignated assets) and that the skyline has been tested, considered and appropriately mitigated, through the use of verified view impact studies.
- (n) Support the delivery of public realm improvements that will contribute to the creation of a boulevard effect, such as:
 - i. A well-defined streetscape through a consistent building line and clearly identifiable non-residential frontage. Building frontages along the M4/A4 should be set back and follow a continuous building line in order to green and animate the street scape.
 - ii. Greening and tree planting.
 - iii. A Council approved consistent suite of street furniture, including, seats, lighting, rubbish bins, cycle stands, landscaping and paving materials and where appropriate, shading.

- (o) Contribute to the delivery of public squares at key locations which can help deliver a strong sense of place to the area with a welcoming and vibrant character that offer respite from the busy A4, M4 and railway corridors.
- (p) Assess the impact of new or altered advertisement signage on the streetscape and on road users on the M4 and A4 carriageways. Applications for signage and advertisement will need to consider the location of existing advertisements and demonstrate how the proposal will not contribute to existing or create additional harm, in terms of townscape (visual clutter), amenity or public safety and is of an appropriate scale. Standalone totems or monolith features will be resisted and the Council will seek signage and advertising features that are of appropriate scale and innovatively incorporated into the built form of buildings.
- (q) Promote active frontages and front doors at ground level to enliven and animate streets.





GWC4

ENVIRONMENTAL QUALITY AND OPEN SPACE

KEY ISSUES

1. Air pollution is a significant issue along the Great West Corridor. This is a direct result of the heavy traffic along the A4 / M4. The issue is particularly apparent along the combined A4/ M4 (elevated section) corridor and at Kew Bridge where the nitrogen dioxide (NO₂) concentration levels are significantly above the air quality objective. Along M4 (west) and parts of Brentford East, the nitrogen dioxide annual mean concentration level lie within a range of 50 - 60 µg/m³ NO₂ that also represents a significant breach of the air quality objective.
2. The North Circular road at Gunnersbury Avenue also suffer from high levels of air pollution with one of the worst exceedances of the NO₂ annual mean objective and the hourly mean objective. A hot spot for pollution can be seen at the junction between the South Circular and the A315 just to the north of Kew Bridge.
3. The noise generated by multiple road transport sources along the A4 and M4 corridor represents a major challenge to residential development but also other uses, including mixed use development, where long-term exposure to relatively high level of noise is considered to pose risk to public health (residential, workers etc.). The study area must address such issues in accordance with Policy EQ5. The elevated section of the M4 projects these noise levels even further with significant impacts on neighbouring noise sensitive receptors or properties.
4. Commercial buildings that face the A4 / M4 corridor can play a significant role in acting as acoustic barriers by sheltering areas behind them from noise.
5. The area benefits from the presence of large quality parks and landscape features such as River Brent/Grand Union Canal, Gunnersbury Park, Osterley Park, Syon Park and Boston Manor Park. Most of these parks are hidden, where access is limited and sometimes difficult to find.
6. Access to existing parks and open spaces is poor due to the M4 and A4 and railway lines which limit movement in a north/south direction.

ENVIRONMENTAL QUALITY AND OPEN SPACE

Our approach

The Council will seek to radically transform the environmental quality, public realm and the image of the Great West Corridor, and to establish a well-connected and continuous green and blue network that strategically links green open spaces, public squares and rivers with neighbourhoods and workplaces to enhance opportunities for relaxation, recreation and a healthy lifestyle.

We will achieve this by:

- (a) Improving the overall greenness of the area, through the planting of mature or semi-mature trees along all streets, integrating planting as part of Sustainable Urban Drainage systems (SuDs), creating green roofs and walls which will help soften the harsh environment, mitigate air and noise pollution, and enhance the image of the corridor.
- (b) Delivering a series of enhancements to parks in the area including Boston Manor by improving entrances, landscaping, upgrading of paths and walkway, nature trails, sensitive repairs to listed buildings and

structures and providing activities and facilities that better serve the local community.

- (c) Providing safe, direct and attractive pedestrian and cycle routes that connect open spaces, rivers and public squares with neighbourhoods and workplaces to enhance opportunities for recreation and a healthy lifestyle
- (d) Supporting proposals that will successfully integrate existing green infrastructure network with the wider London green infrastructure networks, including River Brent/Grand Union Canal, Boston Manor Park, Gunnersbury Park, Thames River, All London Green Grid and Blue Ribbon Network.

The Council will expect development proposals to:

- (e) Design and position buildings to minimise exposure to elevated levels of pollution by locating sensitive uses away from existing or planned sources of air and noise pollution, unless appropriate mitigation is provided that can demonstrably reduce such pollution to acceptable

limits. Less sensitive non-residential uses should be sited adjacent to the Great West Road/M4, acting as a physical “buffer” between the road and more sensitive uses to the rear.

- (f) Use design and construction best available techniques (BATs) to mitigate and minimise any adverse/significant adverse effects and avoid (prevent) any unacceptable adverse effects on health and quality of life (e.g. soil, noise, water, air or light pollution, etc).
- (g) Demonstrate that proposals have optimised urban greening in schemes through planting of mature and semi mature street trees, creating living roofs and walls and providing habitats for wildlife which increase biodiversity and reduce the impact of the ‘heat island effect’.
- (h) Facilitate the delivery of new high quality public squares and open spaces which offer an attractive and calm environment amidst the noise.
- (i) Improve the ecology of the area and provide an overall net gain in biodiversity by conserving and enhancing existing biodiversity habitats in Boston Manor Park,

ENVIRONMENTAL QUALITY AND OPEN SPACE (CONTINUED)

Gunnersbury, area along the Grand Union Canal/ River Brent and a linear area along Hounslow Loop's rail sidings.

IMPLEMENTATION

1. The Council will work with key stakeholders such as neighbouring councils, landowners, and public and private agencies to improve the quality, connections and access to Metropolitan Open Land, Sites of Nature Conservation and Open Space in the Great West Corridor.
2. The Council will work with the sub-regional All London Green Grid working group and with neighbouring boroughs to assist in the delivery of regional green infrastructure;
3. Open Spaces will be reviewed periodically through the Authorities' Monitoring Report to reflect changes in quality and quantity
4. The Council will revise its Infrastructure Delivery Plan annually to provide an up-to-date assessment of the need for all types of community infrastructure; and
5. The Council will use development contributions to help deliver green infrastructure provision without undermining the viability of the development.

WE ARE TAKING THIS APPROACH BECAUSE

4.28 Air and Noise pollution is a significant issue along the Great West Corridor. This is a direct result of the heavy traffic along the A4 / M4. Hounslow emerging Noise SPD identifies that the principle sources of noise pollution in the Great West Corridor are from road transport particularly along major arterial roads such as the A4 and M4, and other disturbance can come from noise generating uses such as industrial and commercial operations. In addition, noise pollution can arise from vibration. All these sources of noise pollution can have a serious effect on human health, and therefore development should seek to avoid and mitigate noise nuisance.

4.29 Residential or mixed use development proposals in these noise sensitive areas should give due consideration to land suitability for such uses and fully explore all options, including creation of suitable buffer between noise source and receiver, acoustic envelope and a combination of double glazing and secondary glazing and distance separation. Our experience shows that day-time and night-time noise level higher than approximately 72dB(A), LAeq, 16hr and 66dB(A), Leq,8hr respectively, from road traffic along the M4 / A4 corridor, are increasingly difficult to attenuate and demonstrate compliance with BS8233.



GWC5

TRANSPORT AND CONNECTIVITY

KEY ISSUES

1. Public transport accessibility into the area is poor and reliant on limited bus services, with the exception of Brentford town centre, Chiswick town centre, and Brentford East.
2. London Underground stations such as Northfields and Boston Manor station are at least 2km from central business activities along the Corridor, hindering sustainable transport options and walkability.
3. Walking and cycling networks are poorly connected, car dominated and street legibility is restricted especially along the A4/Great West Road, under the M4, and along the A315.
4. There are accessibility and capacity issues at rail stations within proximity to the Corridor, with stations such as Gunnersbury Park, Syon Lane, and Kew Bridge lacking step-free access.
5. Infrastructure barriers, such as the M4 and A4 corridors, the South Circular
6. Roads, rail lines, and large scale self-contained commercial development create segregation and restrict movement within and through the area.
6. Existing infrastructure networks such as strategic road networks and rail services are nearing capacity which could impede development and growth if improvements are not made to secure sustainable transport and enhance connectivity.
7. Air quality and noise pollution from traffic reduces the enjoyment and use of the corridor, especially along the M4/A4 route.

TRANSPORT AND CONNECTIVITY

Our approach

The Council is committed to supporting sustainable development and growth along the Great West Corridor. To ensure that this growth is sustainable, the Council recognises that sustainable transport options need to be improved throughout the area to provide attractive alternatives to the private car and reduce car dependency. This will in-turn reduce negative impacts this brings in terms of congestion and environmental damage. This will require working with a range of partners and stakeholders.

We will achieve this by:

- (a) Actively supporting and facilitating the delivery of new transport interchange sites. This could include safeguarding land for future station development proposed at:
 - i. Golden Mile Station: Brentford - Mainline to Southall Crossrail Link
 - ii. Lionel Road Station: Old Oak Common - Hounslow Overground Link

- (b) Improving cycling infrastructure throughout the area, specifically along the A315 (Cycle Superhighway 9) and other 'quietway' routes, improving safety for all vulnerable road users and help to deliver liveable neighbourhoods.
- (c) Working in partnership with TfL and bus service providers to improve the frequency and efficiency of the bus network to and through the Corridor
- (d) Improving connectivity to the London Underground network through supporting the development of better links to the Piccadilly line, for example through the 'Boston Manor Boardwalk'.
- (e) Supporting improvements to rail stations close to the Corridor to improve access (particularly for mobility impaired people) and increase capacity for users arriving or dispersing at peak congestion times.
- (f) Actively encouraging walking and cycling through the provision of an attractive public realm that helps to link the Great West Corridor and surrounding neighbourhoods such as Brentford Town Centre, Brentford East

and the River Brent Quarter better for those travelling on foot or by bike.

- (g) Supporting the sustainable growth of housing and business developments by taking a holistic approach to infrastructure planning, ensuring connectivity is prioritised along with any new development.
- (h) Working with key stakeholders to reduce vehicle congestion in traffic hotspots such as the Chiswick roundabout, along the M4/A4, and along the orbital connector routes.

The Council will expect development proposals to:

- (i) Support sustainable connectivity by prioritising pedestrian, cycling, and public transport as primary means to travel to and from the development site. This is especially relevant to connecting development to the surrounding London Underground stations north of the Great West Corridor, and in proximity to existing transportation hubs such as Brentford Station.
- (j) Incorporate readable and safe pedestrian access pathways within site

TRANSPORT AND CONNECTIVITY (CONTINUED)

design. Where there is the opportunity to do so, proposals will be expected to improve the continuity of the existing cycling provision, especially along the A4/Great West Road.

- (k) Ensure that new developments provide cycle parking facilities in accordance with the appropriate standards.
- (l) Encourage sustainable transport options by providing provisions for electric vehicles and car sharing programmes where feasible.
- (m) Adhere to traffic regulations during construction to prevent the disruption of traffic flow as per development guidelines and policy EC2 of the Local Plan and the London Plan (2016).
- (n) Contribute to the funding of local transportation and connectivity through s106 and/or CIL payments.
- (o) Reduce barriers to connectivity by providing developments with an outward facing, vibrant, street level frontage that provides accessible thoroughfares for pedestrians. Designs that enhance pedestrian access along major arteries such as A4/ Great West Road will be encouraged.



IMPLEMENTATION

In order to achieve the goals laid out in the policies above, the Council will:

1. Continue to work with strategic partners such as TfL, Network Rail, and neighbouring boroughs to bring game-changing infrastructure to the Great West Corridor area.
2. Implement travel demand management measures along the Corridor to reduce peak time travel congestion.
3. Actively support sustainable transport initiatives to encourage efficient business travel including car sharing programmes, cycle sharing schemes, and electric vehicle charging facilities, as outlined in the council's transport strategy, the Local Implementation Plan for Transport (LIP).
4. Work with TfL to deliver Cycle Superhighway 9 along the A315 Road and continuously improve walking, cycling networks, creating a range of parallel and cross-corridor routes.
5. Lobby TfL for enhanced bus service along the A4 to provide improved transportation to employment sites along the Corridor.
6. Work with TfL to increase pedestrian safety along the A4 corridor by improving pedestrian crossings, especially at key intersections that provide a north/south access across the A4, connecting Brentford and South Ealing.

P1

GREAT WEST CORRIDOR WEST

OVERVIEW

5.4 The Great West Road was built as a bypass around Brentford in 1925. Following its construction, large multi-national companies were attracted to the area because of the strategic accessibility of the wide road as well as the availability of large tracts of land alongside it. By the Second World War, companies such as Beechams, Gillette and Firestone had located their headquarters along the road, heralding a new era of modern offices and factories, technology, research and development. The legacy of this pattern of development endures today with many historic headquarter buildings remaining. The listed Art Deco Gillette building with its landmark clock tower, the JC Decaux Building and the former Coty Cosmetics building (now Syon Clinic) are some examples of the area's rich Art Deco heritage associated with its unique history. Today, the West of the Corridor continues to serve an important employment purpose and much of it is designated as a Strategic Industrial Location, in accordance with Policy 2.17 of the London Plan, with a number of large businesses, such as Sky Media situated in the area.

5.5 The role of the A4 and M4 roads as significant transport arteries have however led to some significant drawbacks to the area. The West of the Corridor is noticeably dominated by motorised transport and accordingly, streetscape and public realm quality are noticeably eroded. The A4 is a wide, multi-lane dual carriageway and the predominance of large footprint development abutting the roadway with large areas of surface parking gives rise to a coarse urban grain. This is further exacerbated by the emergence of a number of big-box developments set within vast car parks.

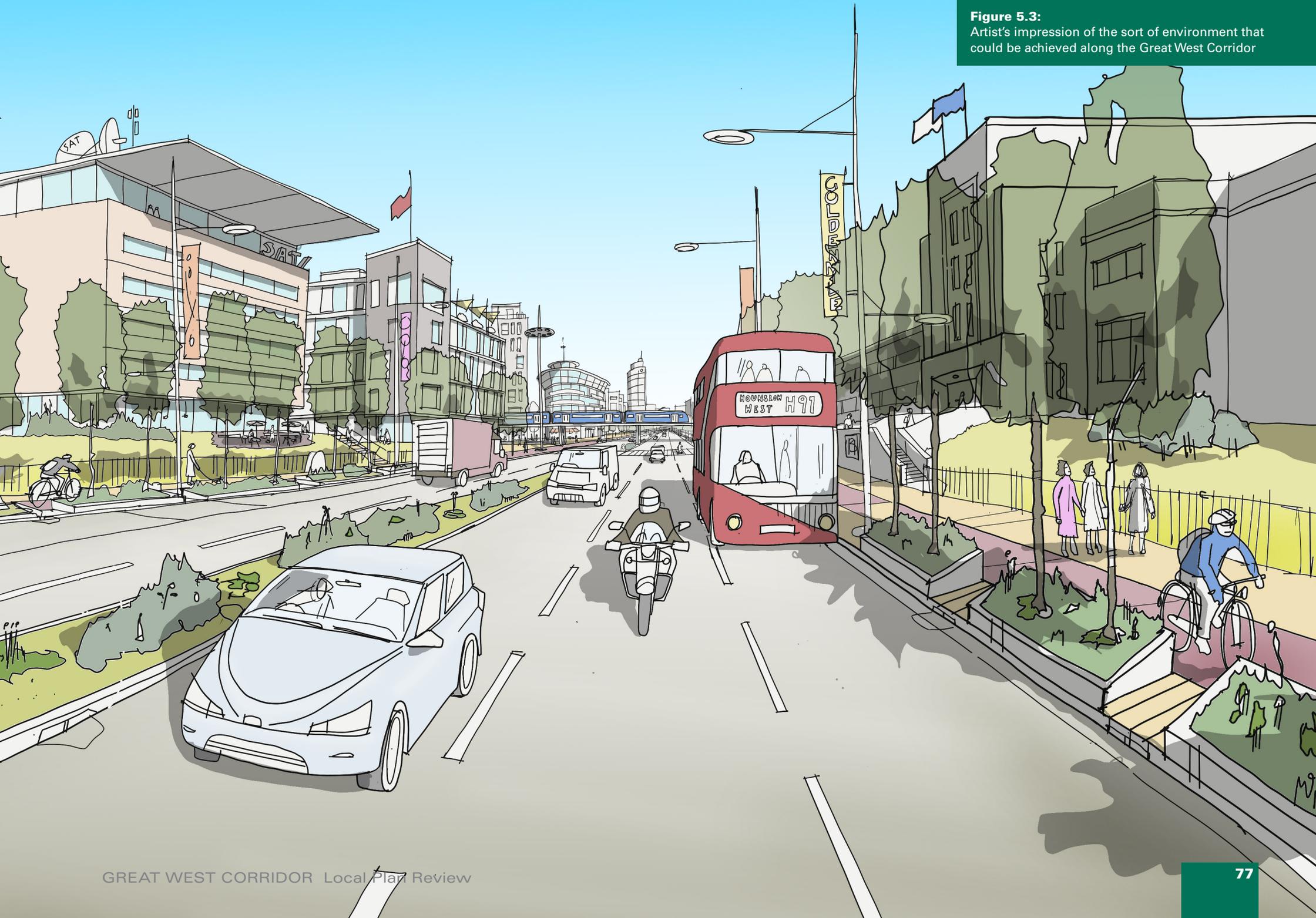
5.6 The River Brent offers direct access to the Capital Ring trail, Osterley Park and Boston Manor Park, but there is otherwise a lack of green and open spaces within the area. Similarly, public transport provision is very poor in the West of the Corridor as indicated by the low PTAL, which is lower than the rest of the Corridor.

5.7 The Council values and supports the West of the Corridor as a strategic employment area, but recognises that it is underperforming as a business location. The area is dominated by traffic, the business campuses are inward facing and relate poorly to one another and the surrounding streets, the built fabric is fragmented, and

there is a lack of a clear identity. The significant vacancies in the office stock – and the underuse of some of the Art Deco buildings – suggest that the area is performing below its potential.

5.8 In light of the West's long-running and strategic industrial and employment function, it has not seen any significant housing development and lacks the services, local amenities and vibrancy associated with more mixed neighbourhoods. There are surrounding residential areas, particularly to the south and west, but poor accessibility and permeability means that they are not well integrated with the West, and as a result, this has restricted the areas ability to sustain the economic, communal and service synergy often found in more integrated urban areas.

Figure 5.3:
Artist's impression of the sort of environment that
could be achieved along the Great West Corridor





VISION

The Vision for the West is for an established employment area that is competitive and attractive to employers and workers alike. The employment offering in the West of the Corridor will retain its status as a hub of television and the digital media, built around the existing Sky Campus. Smaller digital and broadcasting companies will form a new cluster around the Sky campus, further strengthening and broadening the area's employment offering.

Supporting the area's employment focus, a limited amount of new housing will be introduced, enabling people to live and work locally, supporting a wider range of local services and adding vitality. The West will be a place that celebrates its rich built and architectural heritage. The area's Art Deco buildings will be preserved and enhanced through new uses and activities contributing to a strong sense of identity for the area. New development will respond to the established character of the area and help

establish a more coherent sense of place along the Great West Road.

The West will enjoy significantly enhanced public transport access and an improved public realm which will encourage greater walkability, contributing to the reduction of car reliance and pollution, and boosting the attractiveness of the area's employment offer.

GREAT WEST CORRIDOR WEST PLACE POLICY

Our approach

The west area of the Great West Corridor provides an opportunity for mixed-use, employment-led development with a particular emphasis on broadcasting, digital and creative industries.

The delivery of the vision for the west area will depend on the Council working with key stakeholders to secure public transport infrastructure items such as the Brentford - Southall Crossrail Link and improved bus linkages to and along the Great West Road, as well as improved walking and cycling connections throughout the area.

We will achieve this by:

Optimising Housing and Economic growth

- (a) Supporting the Sky Campus as a major employer and asset to the area and working to increase its pedestrian permeability and public transport accessibility, in order to strengthen its attractiveness as a hub for the broadcasting and digital industries.
- (b) Promoting the redevelopment and intensification of the West Cross Quarter to deliver a mixed-use quarter including

a minimum of 1,400 mixed-tenure residential units; 140,000 sqm of B1 workspaces (light industrial floor space should be the predominant use); and 2,000sqm of A1-A4 (retail/café/restaurant) floor spaces. Any redevelopment should be in accordance with the SIL designation and should not lead to any loss of employment floor space.

- (c) Supporting the conversion of the Gillette building into a creative hub for smaller businesses and freelance workers in the digital, media and broadcasting industry, through the provision of a minimum of 19,000 sqm of B1 workspaces (creative industries and offices) and 700sqm of retail spaces as well as 114 apartments in mixed-use blocks to the rear of the site.
- (d) Promoting the area south of the Great West Road into an area of higher-density affordable office and manufacturing spaces, 'The Makers Village', through conversion, retention or redevelopment of existing building stock, including at least 28,000sqm of B1 workspaces and 2,000sqm of retail spaces.
- (e) Supporting intensification of use of the Tesco Osterley site through promoting redevelopment of the site to include

residential development and a re-provided supermarket (of at least 13,000 sqm of retail and integrated car park) including a minimum of 560 mixed-tenure residential units; 1,500 sqm of B1 workspaces.

- (f) Supporting the local economy by delivering a range of high-quality workspaces and seeking a proportion of affordable workspaces for start-ups, small and medium-sized enterprises.
- (g) Requiring residential or mixed-use developments to be designed and managed in a manner that safeguards the future operation of existing industrial uses, in areas such as Transport Avenue.

Design and Heritage

- (h) Requiring new development to preserve and enhance the listed Art Deco buildings and structures in the area, including their setting and distinctive frontages, to bring them back into use, to give them due prominence and to improve the surrounding public realm, including the landmark Gillette Building, Coty Cosmetics building (now Syon Clinic), JC Decaux building, and the central gates, gate piers and railings to the former Firestone Factory.

GREAT WEST CORRIDOR WEST PLACE POLICY (CONTINUED)

- (i) Supporting new development with a range of building heights from 12 to 24 metres where appropriate, that responds to sensitive boundaries, including adjacent listed buildings, and views from Syon Park.
- (j) Supporting the building of landmark quality adjacent to Shield Drive and Transport Avenue to demarcate the location of the proposed Golden Mile Station, subject to the delivery of the station.
- (k) Supporting new development along the Great West Road with a uniform building line, active frontages and adequate landscaping along the frontage consistent with that of the former Coty Cosmetics building (now Syon Clinic) and JC Decaux building and to establish a defined streetscape with a stronger sense of enclosure.
- (l) Supporting the creation of an attractive arrival square to the south west of the proposed Golden Mile Station, with limited ground floor retail and/or café uses.

- (m) Creating an attractive new diagonal street connecting the Sky Campus to the proposed 'Golden Mile' Station with active ground-floor frontages and a green space at the heart of the West Cross Campus.

Transport and Connectivity

- (n) Improving public transport provision, including an improved bus service along the Great West Corridor, linking railway stations and key employment centres, including Syon Lane and the Sky Campus.
- (o) Supporting the delivery of the Brentford – Southall Crossrail Link service connecting to the new Golden Mile Station on the Great West Road, utilising the existing freight line.
- (p) Establishing continuous, high-quality walking and cycling routes throughout the area, where possible using green and blue corridors, including:
 - i. Cycle lanes along the A4 to create a safe, segregated and continuous 'Great West Cycleway'.
 - ii. Strengthening access to the River Brent.
- iii. A link to Brentford High Street utilising the disused railway embankment and crossing the railway line.
- iv. A new boardwalk from the Great West Road across the River Brent and M4 to Boston Manor Underground Station.
- v. Pedestrian crossings across the Great West Road, including improving the underpass at Gillette Corner, replacing the existing footbridge by Syon Clinic with a new and improved road crossing, preferably at-grade and associated with the new Golden Mile Station
- vi. Improved pedestrian permeability throughout the area.
- (q) Ensuring a high-quality, permeable and pedestrian oriented public realm that maximises route choices for users and connects both sides of the A4.

GREAT WEST CORRIDOR WEST PLACE POLICY (CONTINUED)

Environmental Quality and Open Space

- (r) Strengthening existing connections and creating new routes to surrounding open areas including Syon Park, Boston Manor Park, and the River Brent, using for example the 'Capital Ring' along the River Brent and the embankment of the disused railway.
- (s) Supporting the transformation of Boston Manor Park, including conserving the Grade II listed structures of the park, appropriately improving the landscaping to the Grade I listed Boston Manor House, increasing biodiversity, and providing facilities for the local community.
- (t) Requiring new development to deliver or support new parks and pocket parks, including at West Cross Campus and between the Gillette factory and Tesco Osterley sites.
- (u) Ensuring that any new residential development is of a high design quality to mitigate any noise and air quality issues and/or is sensitively located away from the Great West Road.

WE ARE TAKING THIS APPROACH BECAUSE

5.9 In policy SV1 of Hounslow's adopted Local Plan, the Council commits to progressing a partial Local Plan Review of the Great West Corridor, and will as part of this determine the location and sustainable quantum of additional employment and residential development above existing Local Plan levels for implementation through new site allocations.

5.10 The Council has commissioned a Masterplan Study for the Great West Corridor in order to identify how employment uses can be intensified, how new residential/mixed-use developments can be accommodated in the area and what additional infrastructure requirements, including public transport, would be required to accommodate new jobs and homes.

5.11 Introducing an element of housing to the West would help to meet housing targets, increase activity and footfall throughout the day and evening, increase viability for local shops and services, and create a stronger urban feel and vibrancy for the area. The concentration of mixed-use development around transport nodes and close to existing residential neighbourhoods will counter isolation and improve the accessibility of homes and workplaces with established social infrastructures and facilities. In accordance with the London Plan and as set out in

Local Plan Policy ED2, the Council will protect designated Strategic Industrial Locations. The majority of the land within the West is currently designated as Strategic Industrial Land, (in order to protect existing employment, the Council has put in place an Article 4 Direction covering the majority of the West to protect against conversions from office to residential uses). The introduction of residential uses within the West Cross Campus would need to be in addition to the existing employment provision, whereby new residential uses would not lead to a net loss of employment space.

5.12 The West has the lowest public transport provision of all parts of the Great West Corridor with a Public Transport Accessibility (PTAL) between 1 and 2 throughout the area. In response to the poor levels of public transport, Sky, GSK and West London University operate their own dedicated bus services for their workforce and visitors.

5.13 Consequently, there is a high degree of car dependency among commuters. This contributes to congestion on the A4 and M4, which are unable to accommodate additional car traffic. The dominance of car traffic in the area leads to environmental problems such as air and noise pollution as well as an unwelcoming environment for pedestrians and cyclist.



P2

GREAT WEST CORRIDOR CENTRAL

OVERVIEW

5.17 The Central area of the Great West Corridor is made up of three distinctive character areas: the 'River Brent Quarter' the 'London Gateway', and the 'London Showroom'. Each of these three areas have the potential for growth, and with improvements to transport and connectivity, the potential to become a hub of business activity along the historic Golden Mile gateway into London.

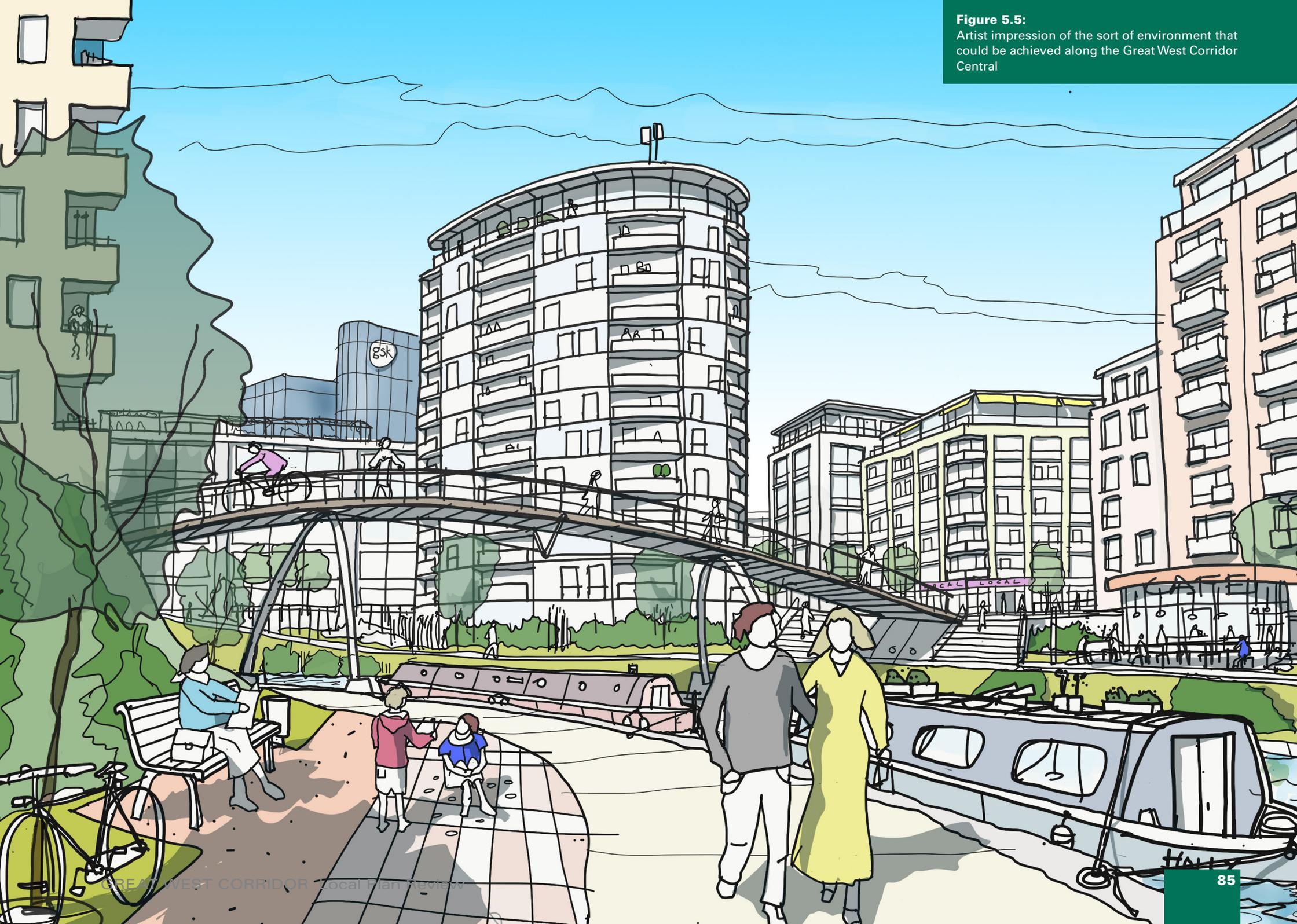
5.18 The River Brent Quarter is located in the south-west extent of the Great West Corridor and currently hosts lower density office parks and a surface carpark. The area has a poor street level relationship with Great West Road and limited interaction with the River Brent.

5.19 The London Gateway, at the intersection of Boston Manor Road and Great West Road, is home to a cluster of high quality commercial use buildings including GSK, Great West House as well as the University of West London. While these office locations are valuable, employees are reliant on private cars and company shuttles

to bring them into the area. Amenities in the areas surrounding these key sites are limited, with options for dining and retail severely limited. The London Gateway backs onto Boston Manor Park, and overlooks the River Brent. There is a towpath under the A4 linking to the Corridor to Brentford town centre; however, access is restricted in parts by current development and the A4 which act as barriers to interaction with either amenity.

5.20 The London Showroom benefits from having several iconic car showroom buildings located along the A4, drawing in customers from both street level and the raised M4. However, at street level, the area is car-dominated and hostile to pedestrians. Off carriage cycle lanes are disjointed and often interrupted by commercial development.

Figure 5.5:
Artist impression of the sort of environment that
could be achieved along the Great West Corridor
Central





VISION

The Council's Vision for the Great West Corridor Central area will be a well-connected, high quality, attractive environment where people will choose to visit, work and live.

The area will enjoy significantly enhanced public transport access and an improved public realm with connectivity across the A4 into the surrounding areas which will ensure residents and workers are a short distance from employment opportunities and community services, thereby reducing the need to travel by car.

The River Brent Quarter will have modern office accommodation, a high quality residential quarter and an active riverside, which enables people to live and work within proximity to the attractive green and blue space of the River Brent.

The London Gateway will be an office destination marked by unique buildings of the highest quality and exemplar architectural design to mark the four corners of the intersection of Boston Manor Road and Great West Road. The

Boston Manor walking and cycling link will establish a more direct route from Boston Manor Station in to the Great West Road, improving connectivity to the London Gateway area.

The London Showroom area will have an expanded car dealership offer, with multi-storey mixed use spaces and high quality, innovatively designed flagship stores, strengthening its role as a car retail cluster.

GREAT WEST CORRIDOR CENTRAL PLACE POLICY

Our approach

The Council will work to strengthen the employment, retail and residential offer of the Great West Corridor Central by promoting mixed-use development that provides high-quality office and commercial spaces, mixed-tenure residential spaces, and a variety of retail uses. To unlock development, the Council will continue to work with key stakeholders to secure transport infrastructure items such as the Brentford Southall – Crossrail Link with the Golden Mile Station, the Old Oak Common Overground Link with the Lionel Road Station, and improving the permeability of the area while addressing safety and environmental issues along the Corridor.

We will achieve this by:

Optimising Housing and Economic growth

- (a) Supporting re-development opportunities for mixed tenure housing and commercial spaces seeking to deliver a minimum of:
 - i. 545 residential units, 27,000 sqm of B1 workspaces (offices and light industrial) in the River Brent Quarter

- ii. 50 residential units, 55,000 sqm of B1 workspaces and 5,100sqm of retail spaces in the London Gateway area
- iii. 192 residential units and 31,000 sqm of commercial workspaces in the Central Corridor area, this could include car showrooms if accompanied by servicing garage facilities.

- (b) Supporting retail and commercial development that encourages an active public realm both during the day and in the evenings, especially in the River Brent Quarter.
- (c) Protecting the London Gateway as a destination for high quality B1 uses that strengthens the employment uses of the area.
- (d) Ensuring new residential development is of a high design standard and compatible with any existing and/or new employment uses to safeguard the future operation of these uses.

Design and Heritage

- (e) Ensuring flagship and iconic commercial developments that retain an outward facing inviting street level presence, especially in the Central Corridor area.
- (f) Supporting new development that promotes pedestrian engagement and encourages continuous active frontages especially within the Central Corridor and the River Brent Quarter.
- (g) Considering a range of building heights from 12 to 24 metres where appropriate. Any Tall Buildings will need to demonstrate compliance with Local Plan Policy CC3.
- (h) Encouraging mixed-use development that preserves and enhances the River Brent and creates a hub of stay and play activities.
- (i) Supporting commercial and office proposals that rejuvenate or redevelop existing buildings where appropriate such as the existing Mille building.

GREAT WEST CORRIDOR CENTRAL PLACE POLICY (CONTINUED)

- (j) Implementing public realm improvements along the A4 and under the M4 to make the area more hospitable, safer and attractive for pedestrians and cyclists.
- (k) Ensuring strict design guidelines when reviewing advertisements along the M4/A4 corridor to prevent visually distracting signage, standalone advertisements, and signage that detracts from the improvements to the public realm.

Transport and Connectivity

- (l) Improving pedestrian access and street legibility by de-cluttering pedestrian areas and improving signage, particularly in proximity to Brentford Town Centre along Boston Manor Road.
- (m) Implementing additional cycle infrastructure and improving existing cycle routes to increase safety and provide further sustainable transport options, particularly along the A4, in the River Brent Quarter and along routes leading into Brentford Town Centre from the A4.

(n)

- (o) Supporting the improvement of public bus services along the Corridor and running north/south of the Corridor in order to encourage ease of access to new and existing sites.
- (p) Maximising opportunities to link Boston Manor station to the London Gateway area by foot and bike to encourage the usage of public transportation.
- (q) Working strategically to reduce traffic along the A4 and promote access to businesses fronting the corridor.
- (r) Supporting the delivery of the Brentford - Southall Crossrail Link to increase the PTAL of the River Brent Quarter and the London Gateway area

Environmental Quality and Open Space

- (s) Enhancing waterfront accessibility in the River Brent Quarter through tow path improvements, connections across the river, and the implementation of waterside facilities.

- (t) Improving access between the River Brent Quarter, the London Gateway area and Boston Manor Park through enhanced pedestrian routes and walkway greening.
- (u) Implementing strategies to improve air quality along the A4/M4 corridor by smoothing traffic flow to reduce idling, encouraging the use of public transport through improved service, roadside greening, and improved pedestrian and cycle routes to encourage healthy and active lifestyles.
- (v) Promoting the greening of public space to enhance the quality of the public realm while improving air pollution, especially along the A4 within the Central Corridor area and within the River Brent Quarter



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