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References:	P/2015/5505	00676/88/P2
Site:	Hounslow Civic Centre, Lampton Road, Hounslow TW3 4DN	
Description:	Hybrid application for demolition of existing buildings, to include a Full application for:- 178 residential dwellings (C3 use), flexible uses including retail (A1 use) or cafe (A3 use) or community centre (D1 use), car parking, public space, landscaping and associated works; and an Outline application for:- up to 762 residential dwellings (C3 use) and associated car parking, public space, landscaping and associated works, with all matters to be reserved except means of access.	

This application is being taken to Planning Committee as a Major Development with a Legal Agreement, on Council owned land and with an Environmental Impact Assessment

1.0 SUMMARY

- 1.1 The Council are seeking to redevelop the site to allow the relocation of the Civic Centre functions from Lampton Road to a town centre location on the corner of Bath Road and Lampton Road, within Hounslow Town Centre. This hybrid application has been submitted in conjunction with a separate full planning application for the redevelopment of Bath Road car park for a new Civic Centre.
- 1.2 The proposal is for the re-development of the current Civic Centre site on Lampton Road to provide up to 940 new residential properties and a flexible commercial/community use through a hybrid planning application. The first phase of the development would deliver 178 new homes, including the retention and conversion of 88 Lampton Road, whilst the second phase would deliver up to 762 new homes with outline planning permission with all matters to be reserved except means of access. Forty per cent of all new homes would be affordable. Parking would be provided across the site within undercroft podiums or on-street within the site, with extensive new landscaping and significant retention of existing trees. The application is accompanied by an Environmental Impact Assessment.
- 1.3 The scheme is considered to be of a high design quality that would be well suited to the existing site and surroundings and would provide a significant delivery of new housing, notably a high percentage of affordable units, all of which would be built to a high design standard. Good quality amenity spaces would be provided for future residents as well as retaining good connectivity across the site to ensure access to Lampton Park was retained. The proposals would result in a slight improvement in respect of vehicle movements to and from the site and the level of parking provision, car and cycle, is considered to be appropriate for this site which benefits from good public transport

accessibility. Whilst the scheme would significantly alter the character of the site, with the introduction of buildings up to 9-storeys in height, these would be finished to a high design standard and the development as a whole would not give rise to an unacceptable impact on surrounding land uses, including neighbouring residential properties, with the significant benefits of the scheme outweighing any perceived harm.

1.4 The application is recommended for approval subject to conditions and a section 106 agreement to secure the affordable housing, construction training, CPZ contribution and a Travel Plan.

2.0 SITE DESCRIPTION

- 2.1 The site is situated on the western side of Lampton Road, between no. 84 Lampton Road to the south and The Lawns to the north. It comprises approximately 5.27 hectares in area and is generally flat. The site is currently occupied by the London Borough of Hounslow Civic Centre, multi-storey car park, Lampton Park Conference Centre and 88 Lampton Road, which sits to the front of the site facing onto Lampton Road. The site is approximately 700m to the north of Hounslow Town Centre. There is extensive mature landscaping across the site, notably along the Lampton Road frontage and the northern boundary of the site, but large, mature trees are to be found across the site.
- 2.2 Lampton Road itself is characterised by an eclectic mix of residential properties, in a variety of sizes and styles, although several have been converted for other uses (e.g. dentist surgery, guesthouse, etc.). Whilst the building styles vary greatly, building heights are generally between two and four storeys with almost all properties fronting directly onto Lampton Road with a set-back along both sides to provide landscaping/forecourt parking. The northern edge of the site is bound by the Laxmi Narayan Hindu Temple, residential properties fronting Neville Close and Lampton School sports hall and playing fields. To the west are the playing fields of Lampton School and Lampton Park itself and immediately to the south of the site is no. 84 Lampton Road, a two-storey, detached house with an extensive rear garden and small outbuilding along the northern boundary.
- 2.3 The existing building comprises four conjoined pavilions built to two storeys with a basement and provides approximately 37,441sqm floor area. The building is set well back from Lampton Road, to the rear of no. 88 and the multi-storey car park, which provides 590 parking spaces for Council employees and is located towards the north-east corner of the site. The original Civic Centre building was extended to accommodate the Lampton Park Conference Centre along the southern elevation, but otherwise remains largely as originally built. Number 88 Lampton Road, a mid-19th century detached villa housed the LBH Registry Office has been extended numerous times over the years to the side and rear in order to accommodate various Council activities. There is public parking to the front of no. 88 along with a large pay and display car park to the front of the main Civic Centre building and an overflow car park along the southern boundary of the site.
- 2.4 Vehicular access to the site is via Clovelly Road from Lampton Road, at the southern end of the site and at the northern end of the site to the front of The

Lawns, which leads directly to the multi-storey car park and basement for servicing and deliveries. There are numerous footpaths crossing the site linking Lampton Road to the park, the Great West Road and Neville Close.

- 2.5 The site has a Public Transport Accessibility Level (PTAL) rating of 3, which is described as 'moderate'. The site is directly served by two bus routes, the 120 (Northolt-Hounslow Bus Station) and the H20 (Twickenham-Hounslow Civic Centre). The H20 service currently terminates within the application site, towards the front of The Lawns. The 111 and H37 routes are also close to the site (within 640m/8 minute walk). Hounslow Central Underground Station is located 330m to the south of the site, serving Central London (and beyond) and Heathrow Airport on the Piccadilly Line.
- 2.6 The site is not located within a conservation area, but a Grade II listed, 19th century building (The Lawns) is located directly to the north of the site fronting Lampton Road.
- 2.7 The site is allocated within the adopted Local Plan (Site Reference 44) for residential development to provide a range of housing types to meet the identified local need from the London Strategic Housing Land Availability Assessment (SHLAA) 2013. The Civic Centre Planning Brief was adopted in February 2015 and confirms that the site has the potential to accommodate in excess of 700 residential units.

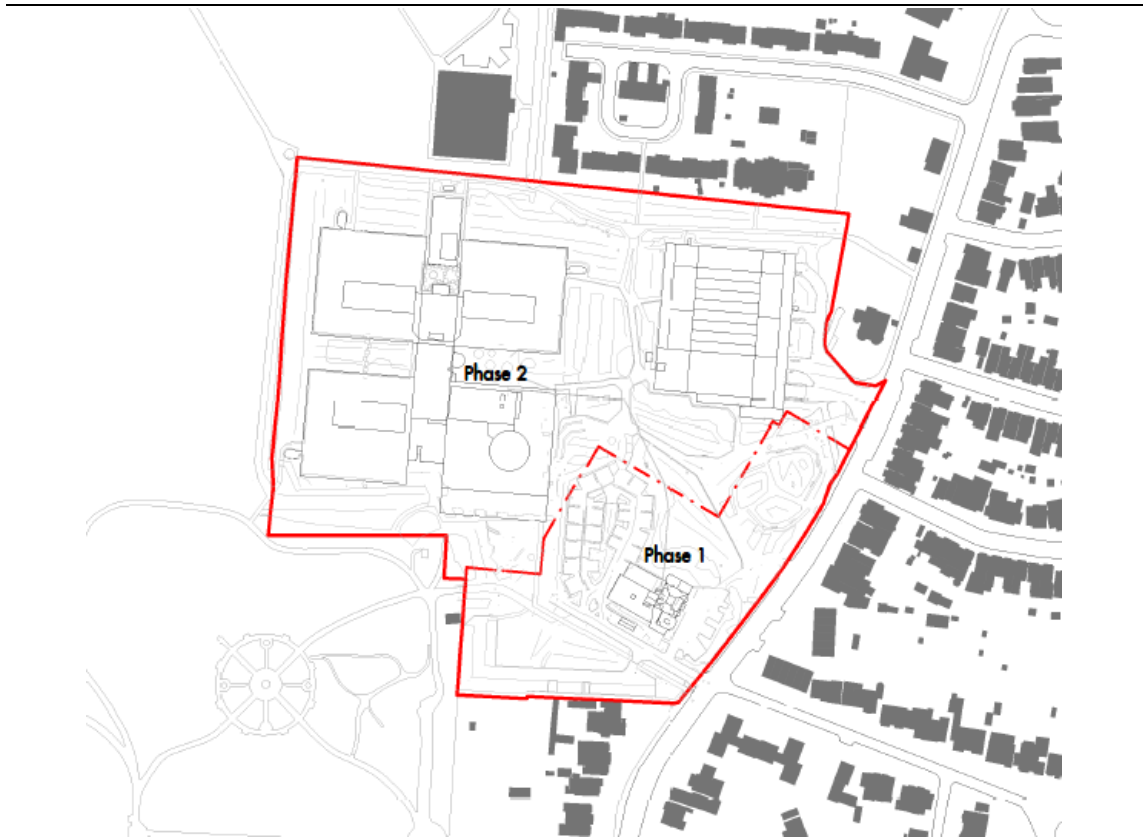
3.0 RELEVANT HISTORY

- 3.1 Planning permission was granted on Appeal by the Secretary of State in 1971 for the erection of 23,262sqm of office space. Subsequently, a number of planning permissions have been granted, the most significant of which was approved in February 2005 for the erection of a single-storey extension and roof terrace to the southern elevation of the building to provide conference and dining facilities (Lampton Park Conference Centre) and the creation of 50 new visitor car park spaces along the southern boundary of the site (application ref. 00676/88/S23).
- 3.2 LBH Cabinet members gave approval on the 17th November 2015 to enter into a Development Agreement with BY Development Ltd to develop a new Civic building at the Bath Road Car Park site and to sell the land at Lampton Road (existing Civic Centre site) in 2 phases for housing development (REG278).

4.0 DETAILS

- 4.1 The application has been submitted in a hybrid form with detailed plans submitted for Phase 1 (full permission) and parameter plans submitted for Phase 2 (outline permission). The parameter plans provide details of maximum scale, massing and footprint proposed. As Phase 2 is for outline permission with all matters reserved except means of access, an illustrative scheme has been shown on the submitted plans for this phase to demonstrate the type of scheme that would be compliant with the maximum parameter plans. This has been used to assess matters such as affordable housing provision, daylight and sunlight. The illustrative scheme shows how Phase 2 could deliver 919 units within the parameter plans and is just one possible manifestation of the scheme

for this Phase.



- 4.2 The Environmental Statement that has been submitted in conjunction with this application tests the detailed plans for Phase 1 and the parameter plans for Phase 2 to ensure that the worst case scenario, in terms of environmental effects, is tested.
- 4.3 The scheme proposes up to 940 residential units, with 178 delivered in Phase 1 and the remaining (up to) 762 in Phase 2. Of these, 750 units will be delivered through Greater London Authority (GLA) Housing Zone funding, with Phase 1 being completed by 31 March 2018 and the remaining by 31 March 2022.
- 4.4 The Illustrative scheme shows how 919 units will be distributed across 10 blocks ranging from 2.5 to 9-storeys in height. The lowest height (2.5-5-storeys) will be located along Lampton Road with individual mansion blocks set back within the existing and enhanced mature landscaping. Blocks proposed along the southern and northern boundary of the site will be 2-6 storeys in height. The height of the blocks will step up through the site towards Lampton Park and along other strategic points. The tallest 9-storey blocks will be located towards the centre of the site and nearest to the park.



Phase 1

- 4.5 Blocks A, B (part) and C (part) form Phase 1. These are located on the area of the site that allows the Civic Centre to remain fully operational until the new Civic Centre on Bath Road is ready for occupation.
- 4.6 Block A is sited in the south-west corner of the site, alongside the public footpath leading to Lampton Park and no. 84 Lampton Road to the south, with its main face onto Lampton Park westwards. It comprises 5 buildings between 3 and 9 storeys forming a courtyard above the ground level undercroft car park providing shared amenity space for residents. An energy centre will also be located within the undercroft space which would serve the entire development. Each core would be serviced with its own bin and cycle store. Lower levels are designed as duplex units screening the car parking and providing direct access to the courtyard amenity space. Larger units are located on the corners of the buildings maximising dual aspects. All three bedroom units would be dual aspect.



- 4.7 Block B comprises 4 buildings of which two are situated along the shared surfaced street. The western block would be arranged over 6 floors with the eastern side over 5 floors. This block will be arranged similar to Block A with lower levels providing duplex units (west side only) with ground level entrances onto the street. The units on the eastern side would be designed around open access corridors on the east side of the building.



- 4.8 Block C consists of 3 'mansion' blocks arranged around a central stair core fronting Lampton Road, set back beyond a mature landscape setting. The lower levels are designed as duplex units with private amenity space to the courtyard side (rearwards) of these units. The three buildings are linked at ground level with a garden wall creating small courtyards between the buildings providing secure bin and cycle stores. The top floors of these buildings will be set back within a sloping mansard roof, which would have a zinc cladding. The courtyard façade is simplified with regular window grid and no mansard roof.



- 4.9 The buildings within Phase 1 have been designed as simple brick forms over various heights. Windows have been restricted to two types, larger for bigger bedrooms and the smaller for the third bedrooms, set into 320mm deep reveals. Brick recess panels and blind windows will be employed to enhance the order of the facades. All buildings have been designed as tenure blind.
- 4.10 The Illustrative Scheme indicates how the design principles established in Phase 1 would be transferred across the remainder of the development, with a series of perimeter blocks similar to Block A replicated across the remainder of the site with a hierarchy of streets and spaces built into the development.
- 4.11 The proposal would result in a density of 174 dwellings per hectare. The proposed mix of units is as follows:

Unit Size	Number of Units
Studio 1B1P	19 (2%)
Flat 1B2P	308 (33.5%)
Flat 2B3P	38 (4%)
Flat 2B4P	249 (27%)
Maisonette 2B4P	97 (10.5%)
Flat 3B5P	87 (10%)
Maisonette 3B5P	110 (12%)
House 3B5P	11 (1%)
Total	919

Unit mix based on Illustrative Scheme of 919 units

- 4.12 Overall, the development will provide 40% affordable housing, with 24% affordable rent and 76% intermediate.

Tenure	No. of units	Phase 1	Phase 2	P1 %	P2 %
Affordable Rent	90 (10%)	18	72	10.11	9.72

Intermediate	278 (30%)	53	225	29.78	30.36
Total Affordable	368 (40%)	71	297	39.89	40.08
Private Sale	551 (60%)	107	444	60.11	59.92
Total Provision	919	178	741	100	100

Tenure mix based on Illustrative Scheme of 919 units

- 4.13 The development has been set out to maximise the north-south grain through the site with the block grain set around a central open space within the site, providing an open space linkage between Lampton Park and the public footpath running northwards to Lampton School and the Great West Road. A hierarchy of spaces will be provided across the development with a network of pocket parks and incidental spaces connecting to Lampton Park providing opportunities for recreation and play.



- 4.14 The existing mature trees and planting will be retained where possible, notably along the northern boundary and Lampton Road frontage, and combined with new trees to enhance the streets and open space.
- 4.15 All units will have access to a private balcony or terrace with communal gardens accessible on podiums or at ground floor level.
- 4.16 The proposals would include the retention of no. 88 Lampton Road. The ground floor would be converted to a flexible retail (A1 use), café (A3 use) or community use (D1 use), or a combination of these uses to allow flexibility within the scheme. This would equate to 114sqm (GIA) with the potential for external seating for any café use. The upper levels of no. 88 would be converted to residential use with a separate access to the ground floor commercial use.
- 4.17 The site will be accessible from three vehicular junctions via Lampton Road,

utilising the existing two vehicle access points to the north and south and one additional access towards the centre. The northern access will operate as a two-way junction with the central and southern access operating as one-way accesses. All two-way roads will be a minimum of 5m in width to allow two vehicles to pass freely. One-way streets will be a minimum 3.7m wide to allow a fire tender to access the street.

- 4.18 The existing bus stand for the H20 route will be relocated within the development to the front of 88 Lampton Road, accessed from the new central road from Lampton Road and exiting onto Lampton Road via the southern point of access.
- 4.19 Some 441 parking spaces will be provided across the site within both undercroft podiums (336) and on-street (105), including provision of disabled car parking spaces, electric charging spaces and two car club spaces. This equates to a ratio of 0.48 spaces per dwelling.
- 4.20 1,513 resident cycle parking spaces and 27 visitor cycle parking spaces will be provided via a mixture of double stacked and Sheffield stands, internally and externally.

	Phase 1	Phase 2	Total
Total no. of spaces	66	377	441 +2 car club bays
Disabled parking spaces	10	34	44
Electric vehicle spaces	14	76	88
Resident cycle parking – double stacked	172	661	832
Resident cycle parking – Sheffield stands	140	540	681
Visitor cycle parking	13	14	27

Parking spaces across the development

- 4.21 The existing Public Right of Way along the northern boundary of the site will be retained, albeit with a minor diversion towards the north-west of the site and a retained link to the north to Lampton School. Pedestrian access across the site will be retained and improved with areas of public realm provided.
- 4.22 Refuse and recycling stores have been positioned to be no more than 10m from the refuse vehicle route through the site (or alternatively a management solution proposed) and also so that stores can be reached by residents in less

than 30m. An inset loading bay will be provided to the front of no. 88 to allow servicing without conflicting with bus routing.

- 4.23 It is proposed that all of the streets within the site are adopted as public highway. This will enable a site-specific Controlled Parking Zone (CPZ) to be implemented.

Environmental Impact Assessment

- 4.24 Owing to the nature of the proposed development, an Environmental Impact Assessment was required. Before determining the application the Council must consider the environmental information contained in the Environmental Statement (ES), as well as representations from consultees about the environmental effects of the development.
- 4.25 The ES assesses likely environmental impacts from the development including its construction and operation, as well as cumulative impacts from other on-going developments. The ES identifies the existing (baseline) environmental conditions and the likely environmental impacts (including magnitude, duration, and significance) and also identifies measures to mitigate any adverse impacts. A summary of potential positive and negative residual effects remaining after mitigation measures is also given.
- 4.26 The ES itself does not necessarily consider compliance with planning policies and so planning permission does not have to be granted or refused based on its findings, but these are material considerations. Where significant adverse effects are found, consideration will need to be given to mitigation proposed and then ultimately to whether the remaining impact warrants refusal or if such harm is outweighed by other benefits.
- 4.27 The ES contains analysis of impacts for the following topics:
- Noise and Vibration
 - Air Quality
 - Traffic and Transport
 - Townscape and Visual
 - Ecology
 - Socio-Economic
 - Daylight, Sunlight and Overshadowing

5.0 CONSULTATIONS

- 5.1 Neighbour notification – 1,159 neighbouring owners/occupiers, including the St Stephen's Residents' Association, the DBBS Residents' Association and the Hounslow Central Residents' Association were consulted on 06/01/2016. Five site notices were displayed around the site on the 23/12/2015 and a press notice on the 01/01/2016. Five comments have been received, as detailed below:

Comments	Response
<p>The proposals are not sustainable or in the best interests of the present community.</p>	<p>The site is allocated for residential use in the Local Plan and consists of the re-use of a previously developed site which is consistent with the overarching principles of sustainable development in the NPPF. A balanced mix of housing will be provided including a substantial contribution towards affordable housing on-site that will help create a sustainable community</p>
<p>No assessment has been undertaken of the impact of the additional population will have on local educational, medical and transport services, including the capacity of the road infrastructure.</p>	<p>The Environmental Statement has assessed the development's social, economic and environmental impacts on the local area.</p> <p>The Transport Assessment indicates that there will be a decrease in vehicle movements to/from the site as a result of this development and consequently there is unlikely to be a significant impact in terms of congestion</p>
<p>No consideration to the long-term disruption, traffic congestion, pollution and noise that will arise by this open-ended, large-scale demolition and construction project.</p>	<p>The scheme benefits from GLA Housing Zone funding and requires the development to be completed by March 2022. The construction period will be managed to minimise the impact on the surrounding area, including traffic, noise, dust, etc.</p> <p>The Environmental Statement has assessed the development's environmental impacts on the local area at the construction stage (and operational stages) and found that there would be no permanent adverse effects.</p>
<p>The blocks of flats needed to house the projected number of dwellings are incongruous to the surrounding area, in particular Lampton Park in terms of visual appearance.</p>	<p>The scheme has been integrated into the existing landscape where possible with further enhancements to provide substantial landscape setting to the proposed blocks. The relationship between the park and new blocks of flats is considered to be appropriate and maximises this</p>

	setting
The present offices should be retained and utilised more efficiently, either by leasing out space or relocating other services to the site.	It is understood that continued use of the existing building would not be efficient or value for money owing to the on-going costs associated with building maintenance. The site has been allocated for new residential development within the Local Plan
The proposals would not fit cohesively within the setting of Lampton Park in the same way that the existing building does.	The scheme has been designed to retain as much of the existing landscaping as possible, in particular the mature trees along the northern boundary and Lampton Road frontage.
There will be an increase in anti-social behaviour and crime around Lampton Park as a result of this development.	The scheme has been designed to be 'Secure by Design' compliant. The position of the blocks of flats in relation to the park would increase passive surveillance and introduce activity along the parks fringes
There will be a loss of habitat for animals such as squirrels and birds.	Ecological enhancement measures are proposed to mitigate the loss of any existing landscaping, including landscaping enhancements and provision for bat and bird boxes within the development
There will be an increase in greenhouse gases produced as a result of this development.	The scheme has been designed to minimise CO ₂ emissions in line with current policy guidance. A number of sustainable travel methods will be employed within the Travel Plan, including a significant provision of cycle parking, electric vehicle charging spaces and car club bays

5.2 **The Hounslow Central Residents' Association** has raised no objection to the proposals but commented that the Flood Risk Assessment makes no mention of the watercourse that used to rise in Lampton Park.

5.3 The following external bodies were notified of the application and their responses are detailed were these have been received:

– **Transport for London** made the following comments:

Trip generation: the approach to trip generation as set out in the Transport Assessment is acceptable.

Highway capacity assessment: TfL would expect cumulative developments to be included in this assessment. The net trip generation presented in the TA indicates a reduction in vehicle trips by 2022 although there is anticipated to be an increase in pedestrian and bus trips. TfL requests that a sensitivity test of a 2018 scenario is carried out to represent a 'worst-case' scenario should the Council not vacate the current Civic Centre building and Phase 2 is not implemented.

Public transport impact: there will be significant changes to bus use patterns in the area. The TA shows a substantial increase of 78 and 90 trips during the AM and PM peak respectively. However, there is sufficient capacity to accommodate the increase in trips within the existing provision. Capacity issues are not envisaged on Underground services or at Hounslow Central as a result of the proposed development.

Bus infrastructure – stand relocation: subject to further information regarding bus tracking, details of the bus stops/stands, routing within the site and drivers facilities, the proposals are considered to be acceptable.

Access: junction modelling has been carried out which indicates that the access junctions can operate satisfactorily in the end state, but does not take into account the peak demand point in 2018 which the 178 residential units will be occupied while the Civic Centre remains operational. The relocation of the bus stop on Lampton Road southwards to accommodate the new central access point is acceptable in principle.

Car parking: the parking ratio for the development is acceptable in the context of the site having moderate access to public transport. It is noted that the Parking Management Plan will allow for the future adaption of disabled users spaces should there be additional demand beyond the existing 10% provision. The Parking Management Plan will be an important document in setting out phasing and allocation of spaces and controls on on-street parking. There is potential for overspill parking on streets not currently within a CPZ and TfL would expect the applicant to work with Hounslow Council to review existing CPZs including times of operation and type of controls/eligibility as well as the need for CPZ extensions to cover unrestricted areas. Residents moving into the development should be exempt from eligibility for residents' working permits. The provision of two car club bays is welcomed.

Cycling: the 1,513 resident's cycle parking spaces and 27 visitor spaces slightly exceed the minimum London Plan standards, which is welcomed. There are no objections to the use of double stacker and Sheffield stands in combination.

Pedestrians: A PERS style audit within the TA indicates that most links and connections were of a good standard.

Travel Planning: the initiatives within the draft residential travel plan are welcomed.

Delivery and Servicing Plan: details of deliveries and servicing for both the commercial units and the residential development will need to be provided. Provision should be made for off street servicing and home deliveries without compromising bus movements through the site. The final DSP should be secured by condition.

Constriction Logistics Plans: A Framework Construction Management plan has been submitted as part of the TV to provide an overview of anticipated

construction activity. Predicted vehicular trips generated by the concurrent office use and construction activity should be set out in the CLP. Conflict with the nearby school will need to be avoided and timing restrictions may need to be put in place to avoid busy school arrive/departure times.

- **Environment Agency** – no objection raised
- **Sport England** – the site is not considered to directly impact on a playing field as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015, but may impact on the adjacent Lampton School playing fields. Having noted that the site has been allocated for residential redevelopment in the recently adopted Local Plan and that a Planning Brief has been prepared and adopted, Sport England does not object to the application in relation to its playing field protection policy.
- **MPS Crime Prevention officer** – no objection raised
- **Thames Water** – identified an inability of the existing waste water infrastructure to accommodate the needs of the development and requested several conditions be included in any permission.
- **BAA Aerodrome Safeguarding** – no objection subject to inclusion of several conditions in any permission
- **The Greater London Authority** – broadly supported in strategic planning terms, but the application does not yet fully comply with the London Plan, as set out below:

Principle of development: the proposed residential-led redevelopment would significantly increase housing supply and is strongly supported in strategic planning terms.

Housing: the illustrative housing schedule is broadly supported and the hybrid masterplan presents a well-designed scheme that would optimise development potential within the Hounslow Housing Zone and increase housing supply. The proposed 40% provision of affordable housing is supported, but GLA officers seek a review mechanism in any S106 to allow for a proportional increase in on-site affordable rent units where scheme viability improves in the future.

Urban design: the hybrid masterplan is well considered and allows the scheme to respond positively to the various contextual characteristics at the fringes of the site whilst optimising development potential within the heart of the proposed development.

Inclusive access: the approach to access and inclusion is broadly supported and the Council is encouraged to secure detailed approval of landscaping matters by condition.

Sustainable development: the proposed energy strategy and climate change adaptation measures are broadly supported in strategic terms. The Council is encouraged to secure associated energy and adaptation details by condition.

Transport: outstanding matters with respect to site access, trip generation and impact assessment, car parking, cycling, walking, travel planning, delivery and servicing plan and construction logistics, as raised by TfL should be addressed.

5.4 Supplementary information has been received to address the matters raised by TfL, notably:

- An assessment to demonstrate the impacts when Phase 1 is occupied whilst the Civic Centre remains operational;
- An assessment of the transport impacts of the development combined with those associated with the new Civic Centre on Bath Road and the High Street Quarter development recently consented; and
- Additional swept path drawings related to the relocation of the bus stand and servicing of no. 88 Lampton Road and the relocation of the existing shelter on Lampton Road (route 120).

5.5 Subsequent to this, **Transport for London** have made the following comments:

Trip generation and impact assessment: the analysis presented is accepted and as a result there is no requirement for any additional highways modelling. It is noted that demand for travel to the Civic Centre is expected to reduce progressively from the 2015 baseline so that 2018 will not represent an additional peak in travel through the implementation of the 'Worksmart' initiative.

Pedestrians: confirmation that since the PERS audit indicated that most links and connections were of a good standard there is no requirement for mitigation.

Construction Logistics Plan (CLP): a full Construction Management Plan for Phase 1 has been submitted and is broadly acceptable. The equivalent plan for Phase 2 will need to be secured by condition.

5.6 Since the application was submitted a number of revised plans have been received comprising amendments to the masterplan site layout to allow for the re-siting of Blocks A, B and C 1.5m northwards of the current position and the re-siting of Blocks E, F and G 1.5m southwards. The revisions affect both Phase 1 (full application) and Phase 2 (outline application). The key consequences of these revisions are as follows:

- Development boundaries are pulled away from the property boundaries of Lampton School and 85 Lampton Road;
- Improved ventilation to the podium car parking in Blocks A and E;
- Improved privacy and protection of overlooking to 84 Lampton Road from Block A and adjoining mansion block;
- General improvements to daylight/sunlight in relation to neighbouring occupiers and developments closest to the northern and southern boundaries;

- Less constraints on methods of construction with additional space between the new development and site boundary; and
- Maintenance will be facilitated more easily on the blocks adjacent to the boundary.

5.7 As a consequence of these revisions, notification letters were sent to all residents who had previously made comments on the application and no. 84 Lampton Road on the 01/03/2016, outlining the consequences of the revisions as set out above.

5.8 Since the proposal is for a major development on Council owned land, the application has been drawn to members' attention on the weekly pending decision list dated 15th January 2016 (Week 3). No request was received for consideration at Area Forum. The application has to be determined at Planning Committee as it is a Major application with a legal agreement on Council owned land.

5.9 The application will be referred back to the GLA (Stage 2) once a resolution has been made by Members. Under the Town & Country Planning (Mayor of London) Order 2008 the Mayor, upon re-consultation by the local planning authority, the Mayor may direct the Council to refuse the application or issue a direction that he is to act at the local planning authority for the purpose of determining the application.

6.0 POLICY

Determining applications for full or outline planning permission

6.1 The determination must be made in accordance with the development plan unless material considerations indicate otherwise. Local finance considerations must also be assessed.

The National Planning Policy Framework

6.2 The National Planning Policy Framework (NPPF) came into force on 27 March 2012, and from April 2014 National Planning Practice Guidance (NPPG) in the form of an online guidance resource to support the NPPF came into effect. The Local Planning Authority (LPA) considers that, where pertinent, the NPPF and NPPG are material considerations and as such, will be taken into account in decision-making as appropriate.

The Development Plan

6.3 The Development Plan for the Borough comprises the Council's Local Plan (adopted by the Council on 15 September 2015), the West London Waste Plan and the London Plan Consolidated with Alterations since 2011.

6.4 The Local Plan documents can be viewed on the Planning Policy pages of the Hounslow website.

Determining applications in respect of listed buildings

6.5 In considering whether to grant planning permission for development which

affects a listed building or its setting, the authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

7.0 ASSESSMENT

- 7.1 The application is a major development, which is the subject of an Environmental Impact Assessment. The accompanying Environmental Statement concludes that the majority of environmental effects during the demolition and construction phases of the proposed development will be negligible or minor adverse, taking into account appropriate mitigation measures that are to be secured by condition or through the S.106 agreement.
- 7.2 On completion of the proposed development, the majority of adverse residual effects have been assessed as not being significant, with the exception of townscape and visual effects (identified as significant adverse but limited to views from Neville Close and some locations to the west of Lampton Park and Lampton Park Gardens), housing mix (identified as moderate-minor adverse significant effect) and school place provision (identified as major-moderate adverse significant effect). Consideration has been given to the design of the development in respect of these views from a townscape assessment, the provision of a balanced housing mix in the context of the site's location and the overall contribution to housing supply and affordable housing in particular and the proposed mitigation in respect of school place provision, which will be assessed in more detail in the following sections.
- 7.3 The ES has also identified a number of beneficial residual effects on completion of the proposed development, these being:
- Transport (minor beneficial)
 - Socio-Economic (major-moderate beneficial with regards to supply of labour)
 - Socio-Economic (moderate-minor beneficial with regards to increased spending in the local area)
- 7.4 The ES concludes that overall the proposed development will have a positive effect on the regeneration of the area and will make a significant contribution to meeting the housing needs in the Borough. The delivery of new homes, provision of high quality public realm, open space and play space will all contribute significantly to the regeneration of the area. These matters will be discussed in more detail below. Where adverse effects from development have been identified, mitigation through conditions or planning obligations and community infrastructure levy payments are proposed to make the development acceptable.

The principle of the proposed residential development

- 7.5 The National Planning Policy Framework (NPPF) states that new applications should be considered in the context of the presumption in favour of sustainable development. It goes on to state (Paragraph 111) that planning policies and decisions should encourage effective use of land by re-using previously developed (brownfield) land, provided it is not of high environmental value.

7.6 London Plan Policy 3.3 (Increasing London's Housing Supply) recognises the 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. Policy 3.4 (Optimising Housing Potential) states that taking into account local context and character, the design principles outlined in Chapter 7 of the Plan, and public transport capacity, development should optimise housing output for different types of location.

7.7 The adopted Local Plan sets out the Borough's approach to Sustainable Development and how it will be achieved (IMP1 – Sustainable Development), and includes:

IMP2 (Delivering Site Allocations): We will ensure that site allocations contribute to the delivery of sustainable growth and supporting infrastructure, which will be achieved by:

- a. Supporting in principle the proposals that accord with the identified site allocation and the proposed use of the site and which have regard to the context constraints and other provisions of the respective site allocations;*
- b. Preparing non-statutory planning briefs, masterplans and promoting housing zone designations where appropriate to support the development of individual site allocations and the spatial integration of related development sites; and*
- c. Considering the use of Compulsory Purchase Orders to support wider regeneration objectives and the delivery of critical or necessary infrastructure.*

IMP3 (Implementing and Monitoring the Local Plan): We will implement the Local Plan, working with strategic partners and the local community and committing to monitoring the progress made year by year. We will ensure that new development in the Borough contributes towards the provision of infrastructure needed to support growth.

7.8 Policy SC1 (Housing Growth) of the adopted Local Plan states that the Council will:

“...seek to maximise the supply of additional housing in the borough in a manner that is consistent with sustainable development principles and built at a rate that will meet the London Plan annualised completion targets and achieve at least 12,330 new homes between 2015 and 2030.”

7.9 It goes on to state that:

“The Council will seek to ensure that during the period between 2015 and 2030, a minimum of 12,330 additional dwellings will be completed. The best available household projections indicate a level of housing need far in excess of the figure of 12,330 dwellings over the plan period.”

7.10 In the adopted Local Plan, the application site is allocated (Site Reference 44) for 'Housing' through identification in the London SHLAA 2013 as it has a

potential housing capacity during the plan period. This allocation notes that the current use must be re-provided should development of the site come forward, with such re-provision either on-site or directed to Hounslow town centre.

7.11 The Civic Centre Planning Brief, adopted in February 2015, allocates the site for major residential development and provides additional detail as to how the site could be developed. The Planning Brief seeks to ensure a high quality development on the site that positively contributes to the surrounding context and open space. It states that development should reference the following principles:

- Residential development in excess of 700 new homes with quality urban and architectural design having the potential to facilitate mid to high density development;
- Mix of dwelling size, with majority of homes feature 2-3 bedrooms, with smaller elements of 1 bedroom and 4+ bedroom units. Some provision of specialist and supported housing would be supported on the site;
- On-site affordable housing provision target of 40% of the total number of homes, subject to viability, to be sought;
- An appropriate quantity of car parking at a maximum of 1.5 car parking spaces per unit – relationship between parking and individual homes should be carefully considered and should not compromise quality of amenity space or streetscape;
- Existing footpaths and access roads into and across the Civic Centre site should be used as the basis of a new street structure wherever possible;
- The Registry Office at 88 Lampton Rod should be moved to a new Civic Centre in Hounslow town centre. However, there is a preference to retain the building;
- Housing typologies to be varied across the site to create subtly distinctive streets and spaces – adherence to common urban design principles governing proportions, materials, plot ratios, heights and roof forms will ensure coherence;
- Provision of quality usable private and communal amenity space that works with the internal plan and external position of individual homes; and
- Domestic scale of 2-4 storeys to predominate across the site, with taller elements up to 6 storeys to mark key points. The site is not suitable for a 'landmark' building solely defined by its height.

7.12 The proposal is generally compliant with the Planning Brief guidance set out above. The site density and building heights are above those identified in the Planning Brief and will be discussed in more detail in the sections below.

Relocation of the existing Civic Centre

- 7.13 The existing Civic Centre has a low employment density and is currently under-occupied, with high running costs and substantial costs associated with building repairs.
- 7.14 Redevelopment of the site will necessitate the relocation of the Civic Centre functions. This proposal is a major opportunity to optimise the use of the existing Council owned site and is integral to the Council's objectives of providing more efficient and cost-effective civic and community services that will benefit the public.
- 7.15 A concurrent, but separate planning application has been submitted for the redevelopment of the car park on the corner of Bath Road and Lampton Road to provide a new Civic Centre. This would help to regenerate the western part of Hounslow Town Centre and is supported by Local Plan Policy ED1 which seeks to promote new office based employment in the Borough's four town centres, Policy TC2 which promotes town centres as a location for businesses and networking, the Hounslow Town Centre Masterplan and the Bath Road Planning Brief, noting that this site is allocated within the Local Plan for civic uses.

Housing Supply

- 7.16 The Mayor's Housing Strategy introduced Housing Zones to increase the number of homes being built in areas with high development potential. Hounslow is identified as a Housing Zone where 3,478 homes (1,400 affordable) are proposed. The proposed development will help to meet housing delivery identified by the Housing Zone Strategy, with a programme to delivery 150 homes by March 2018 and 750 by March 2022.
- 7.17 The proposed level of housing is supported throughout the Development Plan, with both the London Plan and adopted Local Plan seeking to maximise housing growth in accordance with sustainable development principles.
- 7.18 It is therefore considered the proposal is in accordance with adopted policies; it would re-use a brownfield site, providing housing within a largely residential area on a site allocated for this use. This would accord with the objectives of the NPPF, the London Plan and adopted local policy, noting in particular the site allocations and the aspirations for the development of this site. The proposal would therefore be acceptable in principle, notwithstanding the other planning issues that will be discussed in turn.
- 7.19 The other main planning issues to consider are:
- Housing: Density, Mix, Tenure, Standards & Amenity Space
 - Urban Design;
 - The impact on neighbouring land uses;
 - Highways, Transport and Access;
 - Energy and Sustainability;
 - Environmental considerations;
 - Socio-Economic considerations; and

- The potential of the proposed development to secure planning obligations

Housing: Density, Mix, Tenure, Standards & Amenity Space

Density

- 7.20 London Plan policy 3.4 (Optimising Housing Potential) sets out a density matrix at Table 3.2. Within this, the application site falls within the definition of a 'Central' area where for such schemes densities of 55-145 units per hectare are given for sites with a PTAL of 3.
- 7.21 Adopted Local Plan policy SC4 (Scale and Design of New Housing Development) seeks new development to balance the need to make efficient use of land and achieve high quality design and accessibility, whilst respecting and responding to local context and character, and protecting existing residents' amenity. It states that the density ranges contained within London Plan policy 3.4 will be used to help guide the design and scale of new housing developments, but that the Council would expect developments to adopt a more sophisticated approach that is responsive to the context and character of the site and its setting.
- 7.22 The density of the proposed development is calculated to be 174 units/hectare (or 506 habitable rooms/hectare) which is marginally beyond the optimum range. Notwithstanding the London Plan guidelines, Local Plan Policy SC4 states that opportunities to maximise housing densities at suitable larger sites in areas of good public transport accessibility should be explored where other planning policies can be satisfied to achieve sustainable development. The proposed design will create a familiar street pattern that builds on traditional terraced streets and more recent higher density buildings in Hounslow and elsewhere in outer London. It is therefore considered that whilst the density of the proposal would be marginally outside the optimal range identified in the London Plan, the scheme has been designed to a high standard that responds to the local context and would not be unacceptable in this instance. It is also noted that the density is supported by the GLA.

Mix, size & quality

- 7.23 The NPPF and the London Plan encourage new residential developments to provide a choice of housing with a mix of family and non-family housing being needed to meet different community requirements. In addition to this need for housing mix, developments over 10 dwellings should include a proportion of affordable homes as established by London Plan Policy 3.13.
- 7.24 London Plan policy 3.8, together with the Mayor's adopted Housing SPG (2012) and emerging draft Housing SPG (2015), seeks to promote housing choice and a balanced mix of unit sizes in new development, with particular focus on affordable family homes. Table 3.3 of London Plan sets minimum space standards for dwellings of different sizes. This is based on the minimum gross internal floor area (GIA) required for new homes relative to the number of occupants, whilst also taking account of commonly required furniture and spaces needed for different activities and moving around, in line with 'Lifetime Home' standards. These standards are reflected in adopted Local Plan policy

SC5. All units have been designed to meet or exceed the minimum London Plan space standards, including those currently out for consultation as part of the Minor Alterations to the London Plan (draft May 2015), as follows:

Unit type	London Plan (draft MALP 2015) standard (sqm)	Mix (no. & %)	Min. size (sqm)
Studio 1B1P	37	19 (2%)	42
Flat 1B2P	50	308 (33.5%)	50
Flat 2B3P	61	38 (4%)	61
Flat 2B4P	70	249 (27%)	70
Maisonette 2B4P	79	97 (10.5%)	82
Flat 3B5P	86	87 (10%)	86
Maisonette 3B5P	93	110 (12%)	93
House 3B5P	93	11 (1%)	93

7.25 Since the accommodation would comply with London Plan requirements in terms of unit sizes it is considered that the proposed accommodation would be acceptable.

7.26 The proposal would provide a mix of unit sizes as indicated in the table above. This would result in 64.5% of the units having at least two bedrooms, which are considered as family-sized units, and of these 208 would have three bedrooms. This is set out against the requirements of Local Plan Policy SC3 in the following tables:

Unit Mix	No. of Units	Proposed	Policy
1 bed	111	39%	35%
2 bed	146	53%	40%
3 bed	21	8%	16%
4 bed	0	0%	9%
Total	278		

Intermediate

Unit Mix	No. of Units	Proposed	Policy
1 bed	11	12%	25%

2 bed	27	30%	45%
3 bed	52	58%	25%
4 bed	0	0%	5%
Total	90		

Affordable Rent

- 7.27 Affordability of three bed homes for intermediate tenures would be difficult to achieve at this site and as such it is not considered that the focus towards one and two bedroom homes in the intermediate tenure would be unacceptable in this instance. It is considered that this mix would help meet the demand from first time buyers who may not have access to larger deposits needed for larger 3+ bedroom properties. The majority of 3+ bedroom units have been directed towards affordable rent, which is welcomed and would help meet an identified need in the Borough.
- 7.28 The housing mix is supported as it will help contribute towards an identified Borough shortage and result in a balanced, sustainable community, in accordance with emerging Local Plan policy SC3.

Daylight and sunlight

- 7.29 There would be no single-aspect, north facing units within Phase 1, although it is noted that there would be 43 single-aspect units (24%) in this phase. As the detailed internal layouts for Phase 2 have not been provided an assessment of the number an acceptability of these cannot be made and would be assessed as part of any subsequent details.
- 7.30 A daylight and sunlight report has been submitted in support of the proposed accommodation to be delivered as part of Phase 1 to demonstrate compliance with the BRE 2011¹ guidance for daylight and sunlight in new developments. Failure does not necessarily mean the impact would be unacceptable and the BRE requirements are advisory, and as they are used for urban and suburban areas they should be applied flexibly to take account of varying densities. The BRE guide also clearly states that it *“is not mandatory and the guide should not be seen as an instrument of planning policy”* and that numerical guidelines should be interpreted flexibly since natural lighting is only one of many factors in site layout design.
- 7.31 The results of this assessment show that 95.8% of the rooms tested (ground to second floors) in Phase 1 complied with the BRE guidance for daylight amenity. Of the 15 rooms found to be non-compliant, four were within 0.1% of the required target levels and as such this marginal shortcoming would not create a noticeable effect on the daylight amenity. The remaining non-compliant rooms are as a consequence of balconies overhanging windows. The provision of balconies is typically considered a trade-off between providing private outdoor amenity space at the cost of lower daylight levels within the deepest parts of a

¹ Building Research Establishment (BRE) Report “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011)

room. In order to minimise the impact on future residents, where possible bedrooms have been located in the inner corners of the courtyards as they have a lesser requirement for daylight.

- 7.32 It is noted that the levels of performance of both daylight and sunlight would improve on the upper floors as a result of lesser obstruction caused by the surroundings and the development itself.
- 7.33 A sunlight assessment for the amenity areas proposed for Phase 1 has been undertaken which indicates that two of the four areas would achieve in excess of 50% of their total area on the 21st March, which would be in accordance with the BRE guidance. However, due to the enclosed nature of the other two outdoor amenity spaces (the area between Block B2 and 88 Lampton Road and the area between Block B2 and B3) these areas would only achieve the BRE guidance levels during summer months. The assessment further shows that Phase 2 would not affect the sunlight amenity for Phase 1 amenity spaces. Within Phase 2, 5 of the 9 amenity areas (the internal courtyards of blocks B, D, D1, E and G) would fail to achieve the BRE 50% target for sunlight and would only receive the majority of their sunlight amenity during summer months.
- 7.34 Overall within the proposed development, 6 of the 13 amenity areas would be adequately sunlight throughout the year, with the remaining areas receiving the majority of their sunlight in the summer months only, although this is likely to coincide with the greatest use of these spaces.
- 7.35 Whilst some of the accommodation would not meet the BRE standards, it is considered that on the basis of the information submitted and taking into consideration the need to provide private amenity space in the form of externally projected balconies, and the layout and form of the proposed development, a satisfactory level of daylight and sunlight would generally be received by a significant majority of the new dwellings and would be broadly compliant with the BRE guidance. Whilst some amenity areas provided in the development would not achieve the BRE guidance, it is noted that these spaces would achieve good sunlight amenity during the summer months at times of most use and that there are accessible alternative spaces as site is immediately adjacent to a large public park which is unaffected by overshadowing from adjacent developments.

Amenity and play space

- 7.36 The provision of good quality, useable amenity space and children's play areas is fundamental to good planning. Particular emphasis on the quality and quantity of the amenity space in developments of this size is needed to ensure adequate provision and accessibility for all residents. Such spaces should be private and secure with safe and convenient access. For flatted developments, communal areas are generally acceptable, although areas immediately adjoining flats should have private gardens/terraces for sole use of those flats.
- 7.37 The adopted London Plan Housing SPG (2012) and the emerging draft Housing SPG (2015) advises that a minimum of 5sqm of private amenity space should be provided for one-two person dwellings, with an extra 1sqm should be provided for each additional occupant. The minimum depth and width of all balconies and other private external spaces should be 1.5m. The adopted

London Plan Housing SPG (2012) and the emerging draft Housing SPG (2015) seeks 10sqm of dedicated play space per child, whilst also recognising that appropriate and accessible facilities within 400m for 5-11 year olds and within 800m for 12 plus age groups may be acceptable alternatives. Based on the 919 unit illustrative scheme, the development will need to provide a minimum 2,240sqm of play space on site.

- 7.38 Local Plan policy SC5 (Ensuring Suitable Internal and External Space) reflects the standards contained in the adopted London Plan Housing SPG (2012) and the emerging draft Housing SPG (2015) in respect of provision of private amenity space for flatted developments, but factors in a requirement to provide communal external amenity space for such developments, with the following benchmarks: 25sqm per flat with up to 3 habitable rooms; 30sqm per flat with 4 habitable rooms; and 40sqm per flat with over 5 habitable rooms (less a reduction for the area of private space provided for each flat). The quantitative space requirements will be applied with regard to exceptional design considerations.
- 7.39 The proposal includes new public space through a mix of central open space, podium gardens and courtyards. Three public gardens are proposed within the scheme, one at the centre of the development providing a large public green amenity and play space, one along the Lampton Road frontage incorporating the existing mature trees and enhancing the setting of The Lawns and 88 Lampton Road and one along the northern edge of the site maintaining the existing pedestrian link and mature trees. Doorstep (0-5 years) and local (6-11 years) play will be provided across the development, incorporated throughout the open spaces. This will complement the adjacent neighbourhood playable space already at Lampton Road.
- 7.40 Across the masterplan, approximately 25,000sqm of public realm space will be provided; 6,700sqm of which consists of playable green spaces and gardens. The remaining open areas consist of roads, paths and shared surface streets. In addition to these public areas, some 3,500sqm of residents' communal amenity areas will be provided in the form of courtyard gardens at podium and ground level with a further 5,500sqm of private amenity space for residents (in the form of back/front gardens and roof terraces). Incidental play elements will feature throughout the open spaces and courtyard gardens will provide space for informal doorstep play. The GLA are supportive of this strategy to provide play space and the proposed provision would significantly exceed the spatial requirements of the SPG. Moreover, it is noted that Lampton Park would offer numerous additional recreation opportunities for older children within the scheme.
- 7.41 All of the proposed new dwellings would have access to a private or semi-private terrace or balcony of at least 5sqm in size or compliant with the adopted London Plan Housing SPG (2012) and the emerging draft Housing SPG (2015) in the case of larger units. Appropriate boundary screening would be provided to ensure these spaces are usable and private. There would be provision of communal gardens across the site. The table below provides details of the amenity space proposed for Phase 1:

Amenity space type	Policy requirement	Proposed (net against
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		policy requirement)
Private/semi-private terraces/balconies	1,139sqm	2,424sqm (+1,285)
Communal Amenity	4,171sqm	578sqm (-3,593)

- 7.42 As can be seen from the table above, there would be significant under-provision of communal amenity space across the site, albeit marginally off-set by the over-provision of private amenity areas. The proposed communal amenity areas, at podium and ground level, have been sited such that they would receive good amounts of daylight with high levels of overlooking to ensure these would be safe and attractive places to use. Details of the finished arrangements would be secured by condition, ensuring there would be a range of landscaped features (seating, planting, play areas, grass, etc.).
- 7.43 Generally it is considered that the landscaping scheme would provide an attractive setting to the development and a pleasant environment for future residents to relax in and enjoy. Whilst the provision would be below some of the benchmarks contained within the adopted Local Plan for communal amenity areas, given the location of the development adjacent to a large public park and the high quality spaces being provided, such an under-provision is not considered to be unacceptable in this instance. It is also noted that the network of green spaces being provided across the development site would be consistent with Local Plan Policy GB4 and result in a positive contribution to the green infrastructure in the Borough.

Privacy and outlook

- 7.44 The adopted London Plan Housing SPG (2012) and the emerging draft Housing SPG (2015) recognises that older planning guidance for privacy sought to achieve visual separation between dwellings by setting minimum distances of between 18-21m between habitable rooms, with these distances being useful yardsticks for privacy. The adopted London Plan Housing SPG (2012) and the emerging draft Housing SPG (2015) requires each dwelling to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 7.45 The scheme has been designed to achieve the requirements the adopted London Plan Housing SPG (2012) and the emerging draft Housing SPG (2015) in respect of separation distances ensuring residents would be afforded appropriate levels of privacy.
- 7.46 The scheme has been designed to ensure residents benefit from an appropriate outlook, in particular through the siting and layout of the individual blocks and their interrelationship. However, it is noted that where maisonettes are provided within courtyard podiums, as in the case of Block A, these would be positioned some 5.75-6.3m from the facades of the adjacent units of the surrounding perimeter block. The maisonettes themselves would be two-storey in height (approx. 4m above the podium level). Measures have been incorporated to try and ensure a satisfactory outlook from the main living space of the properties surrounding these maisonettes is achieved, notably through

the set-ins created by the provision of roof terraces and the materiality of the flank walls of these maisonettes that would directly face other flats. Whilst this relationship is not considered to be an ideal scenario for future occupants, in the context of the development as a whole, and bearing in mind that the affected units are dual aspect, such a relationship is not considered to be unacceptable given the scale of the development and the significant contribution to housing supply that will be delivered.

Internal noise environment

- 7.47 The NPPF replaced the Planning Policy Guidance that previously covered planning and pollution control and new development in England. This removed the categorisation of sites within Noise Exposure Categories, with reference directed towards the Noise Policy Statement for England², and for decisions to aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development and to mitigate and minimise other adverse impacts, including by use of conditions.
- 7.48 The Planning Practice Guidance (PPG) “*advises on how planning can manage potential noise impacts in new development*” and provides guidelines that are in line with the NPPF. The factors that are to be considered in determining if noise is a concern are identified in the PPG, including the absolute noise level of the source, the existing ambient noise climate, time of day, frequency of occurrence, duration, character of the noise and cumulative impacts. It further highlights that impact may be partially off-set if residents have access to a relatively quiet façade as part of their dwelling or a relatively quiet amenity space (private, shared or public). Full details of the PPG on effects are provided below:

Perception	Examples of Outcomes	Increasing Effect Level	Action
Noticeable and not intrusive	Noise can be heard, but does not cause any change in behaviour or attitude.	No Observed Adverse Effect	No specific measures requires
Lowest Observed Adverse Effect Level			
Noticeable and intrusive	Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows due to noise	Observed Adverse Effect	Mitigate and reduce to a minimum
Significant Observed Adverse Effect Level			
Noticeable and disruptive	The noise causes a material change in behaviour and/or attitudes,	Significant Observed	Avoid

² Developed by DEFRA and published in March 2010

	e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of noise.	Adverse Effect	
Noticeable and very disruptive	Extensive and regular changes in behaviour and/or inability to mitigate effect of noise leading to psychological stress or effects	Unacceptable Adverse Effect	Prevent

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

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

Activities	Location	Daytime (07:00-23:00)	Night-time (23:00-07:00)
Resting	Living rooms	35dB	-
Dining	Dining room/area	40dB	-
Sleeping (daytime resting)	Bedroom	35dB	30dB
-	Outdoor amenity spaces	55dB	

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

7.52 BS:8233 also gives upper guidelines for outdoor amenity spaces of 55dB $L_{Aeq,T}$. Given that the application site falls outside the 63dB Heathrow noise contour, this target will not be achieved all the time throughout the whole day.

7.53 The Planning Brief identifies the site as being located within the 63dB L_{Aeq} noise contour for Heathrow airport and noise exposure category B. Development in this location is acceptable, provided reasonable measures are taken to secure acceptable conditions within and outside any buildings.

7.54 A Noise and Vibration chapter forms part of the Environmental Statement of this application. It states that in order to achieve the internal noise levels detailed in the table above, external noise ingress would need to be controlled by the building façade. Noise predictions have been carried out to provide the highest predicted noise level incident on each building façade with an indication of mitigation requirements in each instance. The details of these mitigation requirements would be secured by condition, and may include:

- High acoustic performance windows of minimum sound insulation performance 37dB (this may be achieved by a number of means, for example 8-16-10.8mm double glazing);
- Moderate sound insulation for walls and roofs;
- An alternative means of rapid mechanical ventilation other than openable windows.

7.55 Furthermore, due to the alteration of the runways at Heathrow Airport, guideline outdoor noise levels will be achieved at regular time periods throughout the week, ensuring residents had access to useable amenity space which was not compromised by overhead noise. Where the guideline outdoor noise levels are unlikely to be achieved, during these times noise levels will exceed the guideline by up to 2-3dB, however relatively quieter communal screened areas will be available as an alternative.

Accessible housing

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

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

7.58 The scheme will deliver 90% Building Regulations M4(2) ‘Accessible and Adaptable’ dwellings (formerly Lifetime Homes) with the remaining 10% designed to M4(3) ‘Wheelchair user dwellings’. The ‘wheelchair user dwellings’ in Phase 1 (18 in total) would be provided across both the affordable rented (3no.) and intermediate (15no.) tenures, which is welcomed. A full breakdown of the size and tenure split is shown below:

Unit type	Tenure	No. of ‘wheelchair user dwellings’
1B2P	Affordable Rent	2
3B5P	Affordable Rent	1

1B2P	Shared Ownership	1
2B4P	Shared Ownership	14

7.59 These standards would be secured by condition.

Waste and recycling

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

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

7.62 The residential waste generated by the proposed development would be managed by the Council's existing waste management contracts and use the standard containers associated with the current waste collection operation. The proposals include space for dedicated storage for recyclable waste in each building, close to building cores. Each individual dwelling will be provided with internal recyclable waste bins in the form of at least 3 separate compartments totalling 30 litres (with no individual compartment smaller than 7 litres). Domestic bin store rooms will be provided within each core and within 10m of the point of collection.

7.63 The details of this provision would be secured by condition but it is considered that the principle of the waste and recycling strategy for the development is acceptable and in accordance with the relevant Development Plan policies.

Affordable housing supply

7.64 Government policy defined in the NPPF, supported by the London Plan, requires that all housing developments in the Borough capable of providing ten or more dwellings should provide on-site affordable housing. The current demand for affordable housing units is spread over a variety of types. The London Plan Housing SPG (2013) defines affordable housing as including social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. This is also reflected in adopted Local Plan policy SC2.

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

established definitions of social rented housing and intermediate housing, with all three products falling within a general affordable housing definition.

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

7.67 The development would provide 368 affordable dwellings within the London Plan and London Plan Draft Housing SPG definitions based on the illustrative 919 unit scheme. This equates to 40% of the accommodation being affordable housing. This tenure split is shown below:

Tenure	No. units	% of mix
Affordable rent	90	24%
Intermediate (shared ownership)	278	76%
Private sale	551	60%
<i>Affordable Housing content</i>	<i>368</i>	<i>40%</i>

7.68 As has been shown earlier (para 4.12), Phase 1 will deliver 18 affordable rent units and 53 intermediate units, with the balance of the affordable housing provision (72 and 225 respectively) coming as part of Phase 2.

7.69 It is clear from the tables above that the tenure split between affordable rent/intermediate is not compliant with Policy SC3 of the Local Plan. However, it should be noted that this policy states that the 60:40 tenure split is the starting point for negotiation and that deliverability will vary on a scheme by scheme basis depending on available funding sources and circumstances.

7.70 The applicant is willing to enter into a Section 106 agreement and will seek to review the provision of affordable rent over intermediate units to increase the ratio in favour of affordable rent units subject to an agreed financial test. This financial test will apply to the affordable rented homes if there is a change to rent inflation from 2020 such that the value of the affordable rented units would rise (the Government's Summer 2015 Budget reduced affordable housing rents by 1% per annum from 2016 to 2020). The increase in value for rented homes would allow the applicant to change units from intermediate to affordable rent home to re-balance the tenure split up to a ceiling provision of 60% affordable rent and 40% intermediate.

7.71 Following discussions with the Council's Affordable Housing Supply team, the proposed amount and mix of affordable housing is welcomed and would help

meet identified need and give quality housing choice in a sustainable location. The proposed review mechanism would allow a re-assessment of the balance of affordable rented against intermediate tenure properties with the potential to bring this more in line with Policy SC2. It is therefore considered that the development would make an acceptable contribution towards affordable housing in the Borough, helping to meet the both the London Plan and Local Plan policies.

Urban Design

Context

- 7.72 The NPPF states good quality design is an integral part of sustainable development and that decision takers should always seek high quality design. It states that achieving good design is about creating places, buildings or spaces that work well for everyone, look good, will last well, and adapt for the needs of future generations, with good design responding in a practical and creative way to both the function and identity of a place, putting land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use. The NPPF also says permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. It is proper to seek to promote or reinforce local distinctiveness.
- 7.73 However it makes clear that planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concern about incompatibility with an existing townscape, if mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).
- 7.74 The degree to which new development reflects and responds to the character and history of its surrounds is a key element of good design as defined within the NPPF. This relationship should be considered throughout the design process, and should inform the positioning, massing, height, and materiality of development proposals. Developing a design solution that works with its surrounding context should not prevent or discourage appropriate innovation.
- 7.75 The London Plan requires all large scale proposals to be of the highest quality design especially in terms of impact on views, the wider and local townscape context and local environmental impact. The achievement of high quality urban design is also highlighted as a key factor in achieving a more attractive and green city.
- 7.76 London Plan policy 7.4 (Local Character) sets out that buildings should provide a high quality design response to the urban grain, street pattern, natural features, human scale and the historic environment and is supported by Policy 7.6 (Architecture) which seeks to promote high architectural and design quality appropriate to its context.
- 7.77 Policy 7.7 of the London Plan (Location and Design of Tall and Large Buildings) does not explicitly define such buildings in the Policy, nor is there specific definition in the CABE Guidance on Tall Buildings on which the policy draws,

but given the height of the proposed tower, the proposed development is considered to clearly fall within this category. It does however, state that:

“Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.”

7.78 Local Plan policy CC1 (Context and Character) states that development proposals should have due regard to the Context and Character Study and policy CC2 (Urban Design and architecture) states that *“We will retain, promote and support high quality urban design and architecture to create, attractive, distinctive, and liveable places”*.

7.79 The Context and Character Study identifies and analyses the urban character of the borough. By assessing the character of those areas of the borough likely to undergo significant growth over the Local Plan period, the Context and Character Study can help new development to add to local character in ways which enhance positive qualities and address negative issues. Within the Context and Character Study, the site is broadly described as being:

- ‘Medium’ Design Quality
- ‘Medium’ Sensitivity to Change
- ‘Medium’ Permanence
- ‘Not suitable’ for tall buildings

7.80 Local Plan policy CC3 (Tall Buildings) outlines the Council’s approach to tall buildings:

“To contribute to regeneration and growth, we will support high quality tall buildings in identified locations which accord with the principles of sustainable development.”

7.81 It goes on to state that tall buildings will be supported in Hounslow town centre and lists 12 criteria against which the Council would expect proposals for tall buildings to comply. These are:

- 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 providing high quality, usable, private and communal amenity space where residential uses are proposed; and*
 - t. Comply with the requirements of the Public Safety Zone for London Heathrow Airport, where appropriate.”*
- 7.82 The supporting text of policy CC3 states that, *“Way-marking can come from distinctiveness rather than size, so tall buildings should be placed in suitable locations where access to public transport is good and they provide a relevant marker and focal point”*. It goes on to state that *“Located in the right place and designed sensitively, tall buildings can add to an area’s townscape and image, assist in regeneration, mark a town centre/public transport node or assist in way-finding”*.
- 7.83 The adopted Planning Brief notes that the area surrounding the site is predominantly two-storey, with some 3-4 storey apartment blocks. It does not envisage tall buildings will be located on the site; however, it confirms that proposed for buildings in excess of 20m may be justifiable on grounds of outstanding architectural quality and provided the amenity of neighbours is protected.
- 7.84 Local Plan Policy CC4 states development proposals should *“conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significant.”*

Site layout & public realm

- 7.85 The 10 blocks that form the overall site masterplan have been designed to create a predominant north-south grain and maximise the east and west orientation of the new units, enabling sunlight to penetrate the communal courtyard spaces and public realm. At the same time paying consideration to the existing urban grain in the surrounding area and forming a hierarchal street network consisting of primary routes that inform the main access points, secondary routes that provide connections between character areas within the development and mews streets that knit the development together and provide a more domestic scale. Shared surfaces are used where streets cross through open spaces, giving priority to pedestrians and cyclists, for example Clovelly Walk will become the main pedestrian link between Lampton Road through the site to the park. Elsewhere existing pedestrian linkages will be retained, such as along the western boundary of the site which will become an active street with maisonettes fronting onto the street bringing activity to this edge of the

park and increased surveillance.

- 7.86 The layout has been based around a series of new public spaces across the site, including three public 'parks' that will be the main focus of pedestrian routes through the site and destinations in themselves within the development. The main area, 'Preben Square' will be towards the centre of the development, providing a large public, linear, green space linking Lampton Park with the pedestrian footpath to Lampton School and the Great West Road beyond helping to create the setting for the larger buildings on the site. 'Bulstrode Park', along the Lampton Road frontage will utilise the existing mature tree planting to enhance the setting of The Lawns and 88 Lampton Road and provide a green gateway to the development. Along the northern boundary of the site, 'Isleworth Green' will integrate the existing mature tree planting with an enhanced pedestrian link between Lampton Road and 'Preben Square' providing a more attractive route through the site than at present with a new mews providing surveillance of the space and bringing activity to this edge of the site, but in a more informal response with a space for relaxation away from some of the primary routes through the site.



- 7.87 These spaces provide an opportunity to integrate local identity through the use of feature paving and a common thread running through the landscaping, whilst at the same time providing highly durable and attractive spaces. It is considered that such treatments would assist with way-finding through the site at a street-level scale.
- 7.88 Across the development, maisonettes and houses will provide frontages to the street, giving direct access and providing an active street frontage and an opportunity to integrate a sense of ownership to the landscaping through semi-private and private spaces adjacent to these properties. It is considered that the layered approach of spaces throughout the development helps to maintain residents' privacy at ground floor whilst also providing attractive pedestrian routes through the site.
- 7.89 The proposal seeks to retain 88 Lampton Road as it is considered to be a significant asset to the character of the area and in particular the street scene along this section of Lampton Road. Furthermore, its retention at the entrance to the development helps act as a gateway to the development site that is

rooted in historical significance and enhances the sense of local distinctiveness within the development. The incorporation of no. 88 into the overall layout of the scheme, and at one of the main accesses to the site, is welcomed and was one of the objectives of the Planning Brief for development of this site.

Scale & massing

- 7.90 In order to determine an appropriate scale and massing across the site, first principles for massing were established by taking a response to the wider scale and height from buildings surrounding the site. Through extensive design work undertaken to identify an appropriate scale within the surrounding townscape, it is considered that a suitable massing has been proposed that is based around good urban design principles. As a baseline for the scale and massing, individual character areas were identified across the masterplan to help define the architectural style, scale and massing, but with a common architectural language through the site. Such an approach is welcomed and considered to help the development tie in with the context and character for this area where generally the scale and massing is fairly consistent at 2-3 storey terraced/detached houses.
- 7.91 The results of this analysis identified that the tallest buildings be located towards the centre of the site adjacent to the new public open space of 'Preben Square' and Lampton Park. Consequently, the proposed massing across the site responds to the different conditions and characteristics along the site boundaries in order to reduce the visual impact of the development, notably along the northern boundary where properties fronting Neville Close directly overlook the application site. Conversely, building heights along Lampton Road are restricted in their height, varying from 2.5 to 5 storeys with a significant set back from the road to ensure the design sensitively responds to existing residential properties on the opposing side of Lampton Road. Such an arrangement also helps to improve the setting of The Lawns to the north, whilst also maintaining the significant, mature tree planting along this frontage.



Massing evolution from December 2014 to current proposal

- 7.92 Building heights have been maximised on a small number of blocks in order to create variation and massing across the skyline and attempt to keep the overall height across the development down. Whilst this has led to taller elements in certain locations, it is considered that such an arrangement has helped reduce the overall massing of the development, with the additional height located in key locations, helping to frame the park and marking key routes through the development for example. Furthermore, it is considered that such variations in skyline benefit longer distance views from across the park and school playing

fields, providing interest and reducing the apparent bulk of the development.

- 7.93 The introduction of 'mansion' blocks along the Lampton Road frontage form a transition between the scale of the larger blocks towards the centre of the site and the existing fabric along Lampton Road, whilst also resonating with the historic scale of no. 88 Lampton Road and The Lawns. Such a relationship is welcomed and provides an appropriate setting for the larger elements of the scheme towards the centre of the site and would result in a front 'face' of the development that responded well to the surrounding development.
- 7.94 The inclusion of maisonettes at ground and first floor would give a more domestic character to some of the larger apartment blocks on the primary routes through the site which will help to reduce the perceived scale of these buildings as they are experienced at street level. Elsewhere other forms of building articulation, such as set-backs, balconies, etc. have been used to help reduce the apparent massing of individual blocks across the site. The predominant brick material palette will also assist in this, providing simple detailing but at a domestic-scale.
- 7.95 A series of two-three storey mews houses line the northern edge of the site, responding to the reduction in scale of properties on Neville Close but also resulting in a sympathetic relationship with the Grade II listed building to the north-east corner of the site (The Lawns). This stepping down in scale towards the more sensitive boundaries is welcomed and helps knit the development in with the surrounding context.

Height

- 7.96 The proposed buildings have sought to generally reflect the opportunities identified in the Planning Brief for the site, increasing in height towards the centre of the site in order to respect more sensitive boundaries around the fringes of the site. Whilst building heights across the development would generally be in line with the guidance in the Planning Brief, there are taller elements that would be up to 9-storeys in height. Once the principle of incorporating taller elements, or tall buildings (defined as being substantially taller than the surroundings), as established, an assessment of where such elements should be incorporated into the site masterplan was undertaken, ensuring that they would have limited impact on the surrounding sensitive boundaries and longer distance views of the site from across Lampton Park and the school playing fields.
- 7.97 Rather than introducing freestanding 'towers', all of the taller elements form part of a courtyard block and whilst taller than the adjacent buildings, remain part of the perimeter block. These elements have been placed at the corners of the blocks, but fully integrated into the wider urban form and address the street identically to the rest of the perimeter building. The locations of these taller elements have been determined to help assist with legibility and way-finding through the site, marking the entrance to Lampton Park for example and other key routes through the scheme (e.g. helping to frame 'Preben Square').
- 7.98 The acceptability of a 'tall' building on this site should be assessed against the criteria within Local Plan Policy CC3, noting that the site does not fall within one of the areas identified as being suitable for 'tall' buildings (e.g. Hounslow Town

Centre). Consequently, the proposals have been assessed against the 12 criteria of this policy (para 7.81 above):

- a. The taller elements of the development have been sensitively located towards the centre and western edge of the site and are of a height (7-9 storeys) that would not be excessive for this substantial site and in proportion with the remainder of the site where building heights vary from 2 to 6 storeys. Their positioning towards the centre and western edge of the site ensure that they would be suitably detached from the general context of the surrounding area;
- b. All elements of the proposal are of a high architectural design quality, incorporating established urban design principles as well as adopted housing standards (e.g. London Plan Draft Housing SPG 2015), which would be finished in a durable, brick façade that would resonate with the predominant materiality in the local area. Furthermore, 'design codes' have been established in the Design & Access Statement that set a wide range of principles for the development in order to maintain the high quality of design through the second phase of the development;
- c. The taller elements of the development have been positioned to help inform strategic routes through the site in order to assist in way-finding and form a distinct hierarchy with the tallest buildings marking the central public space through the development ('Preben Square');
- d. The taller elements of the development have been designed to create variation in the roofline across the site, helping to reduce the apparent massing of the site, in particular in longer distance views. The up-and-down nature of the building heights helps to break up the visual scale of the development and every façade has been treated a 'front' offering visual interest;
- e. Building heights have responded to the generous scale of public realm both throughout the development itself but also in response to the open expanse of Lampton Park to the west. These will help provide a well-defined enclosure of the park and playing fields and help to terminate key distant views. Where the tallest elements are located, these are immediately adjacent to substantial areas of public realm, helping to frame these spaces;
- f. An assessment on microclimate and overshadowing has been undertaken and demonstrates that the proposed building heights would not have an unacceptable impact on amenity in this regards;
- g. Green and brown roofs would be provided to a number of buildings across both Phase 1 and Phase 2 of the development which would help promote biodiversity within the development. Furthermore, the building heights have been designed to respond to the public realm areas, in particular the new landscaping throughout the development and the existing park to minimise any direct impacts on these spaces in terms of biodiversity;
- h. The taller elements of the development are positioned a significant distance away from the only heritage asset in the vicinity of the site; the Grade II

listed The Lawns in the north-east corner of the site. In this location building heights step down to 2.5-storeys and are set back from the frontage to give an enhanced setting to this building;

- i. The development as a whole has been designed to articulate the elevations of each building, providing active frontages at ground level with front doors onto streets, and a combination of projecting and inset balconies at upper levels. Windows have been designed to have deep reveals with window sizes corresponding to the use of the room within, i.e. smaller windows for second bedrooms. It is considered such features, when considered as a whole in conjunction with the building scale and materiality will help break-up the visual scale of the buildings;
- j. The development will be finished in high quality, robust materials, with brick facades providing the predominant material, but with metal/glazed balconies and deep window reveals helping to break-up individual facades.
- k. Each courtyard apartment building would have a large communal garden at podium level, which as a result of the sensitive positioning of the taller elements of the buildings, would receive satisfactory levels of sunlight, ensuring such spaces were usable and attractive for residents.
- l. Heathrow Safeguarding have raised no objection as detailed in paragraph 5.3

7.99 Whilst the proposal would undoubtedly affect views from across the park, it is noted that there is already a 5-6 storey development adjacent to the park (north-west corner, Harris Close) and as such, it is not considered the principle of having significantly taller buildings around the fringes of the park would be unacceptable. It is considered that such a relationship will help to provide a degree of enclosure to these park fringes without appearing overbearing, giving rise to increased surveillance around the perimeter of the park. Furthermore, the established, mature trees within the park will provide a degree of screening of the taller elements within the development from shorter distance views from within the park throughout much of the year, whilst the taller elements will 'pop' up above the tree line from longer distance views on the opposite side of the park, providing an interesting skyline and assisting in way-finding.



View from across Lampton Park

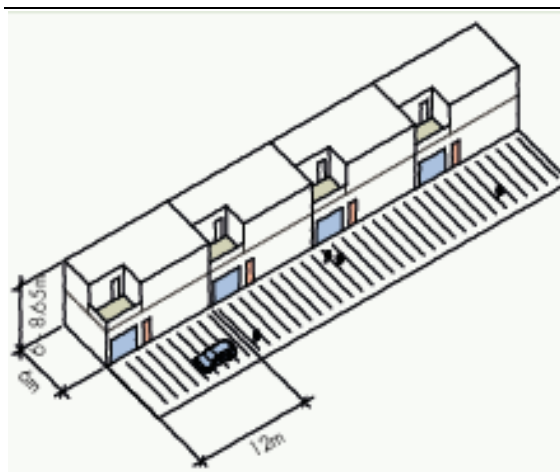
7.100 The impact of the development on residential amenity will be discussed in detail in the following section, however it is noted that the taller elements of the development, being located towards the centre of the site and away from adjoining residential properties, would minimise the level of impact on the amenity of these residents.

7.101 A Townscape and Visual Chapter forms part of the ES submitted. This identified that the area from which the site can be seen is predominantly limited to its immediate surroundings and took into consideration the development's effects on the heritage assets of no. 88 Lampton Road and the setting of The Lawns Listed Building and the large villas on Lampton Road. No sensitive viewpoints or panoramas, or any other heritage (statutory or non-statutory) were identified. Longer distance views (beyond the extent of Lampton Park to the west and south) were not assessed as these would only be available from upper storeys of tall buildings (private viewpoints) and in the varied townscape context of Hounslow the effects were considered to be negligible. The assessment concluded that there would be a significant beneficial effect on the setting of The Lawns Listed Building and the setting and removal of detracting features from no. 88 Lampton Road.

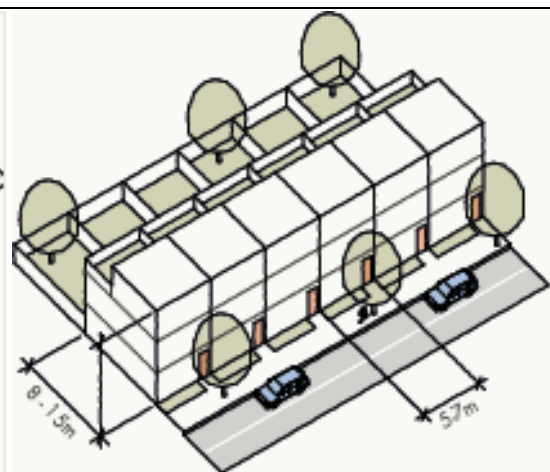
7.102 As such it is considered that the proposed heights of the development would broadly accord with the design criteria established in both London Plan Policy 7.7 and adopted Local Plan Policy CC3 and would result in a positive addition to the Hounslow skyline that would be of an exemplary design quality, befitting its prominence and setting on the fringes of Lampton Park.

Materiality & typology

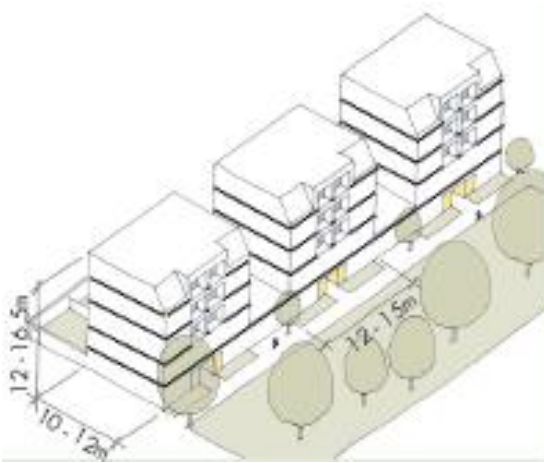
7.103 The proposal is based around a number of key building typologies that help to define the individual character areas within the development and build upon the hierarchical street network. These are; mews houses, terraced houses, mansion blocks and courtyard apartment blocks. Whilst these building types will help to define individual areas within the development, there will be a common architectural language that forms the background against which various elements are highlighted to create distinct features. Such an approach is welcomed and helps provide a sense of uniformity across the site whilst also helping to up-play some of the key features without over-scale dramatic changes in built-form.



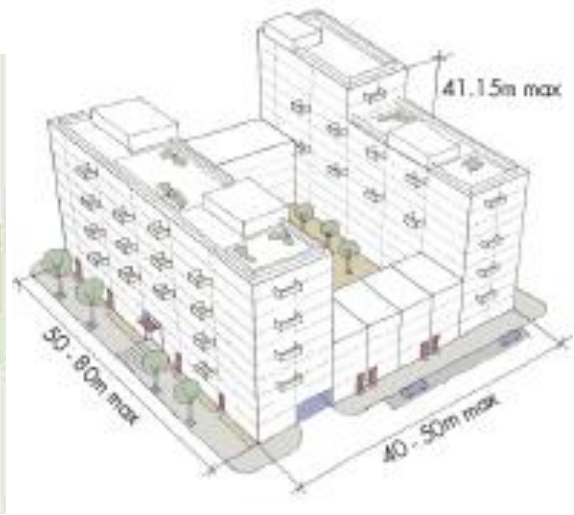
Mews houses



Terraced houses



Mansion blocks



Courtyard apartment blocks

- 7.104 The building block typologies provide the opportunity to help reduce the apparent mass of the development and provide a means to delineate the public realm from private spaces within the perimeter arrangement. Building frontage character relates closely to the type of route or space defined by that particular building (e.g. primary, secondary or mews). Whilst the architectural concept allows for each building block to have its own identity, and the scheme has been designed such that they would, where there is the opportunity, through materiality and other features (fenestration, balconies, etc.) to create a sense of uniformity within the development that would ensure that the proposal would not become overly complicated and fussy.
- 7.105 The proposal seeks to use the highest quality materials to make a positive contribution to the public realm, streetscape and wider townscape. Predominantly the development will consist of brick facades, helping to resonate with the local context, but also allowing for variation between blocks as well as introducing texture, longevity and consistency across the scheme. Pre-cast concrete piers and cills and steel and glass balconies will be used to add detail and contrast to the external elevations. This approach results in a visually harmonious palette of robust materials, which, when coupled with well-proportioned window and door openings with deep reveals, provides a strong architectural response to this setting.
- 7.106 A series of 'Design Codes' have been set out in the applicant's Design & Access Statement that identify some of the key parameters and characteristics for the site-wide masterplan and individual building typologies. The establishment of these principles at this stage is welcomed and helps provide a degree of comfort for the delivery of Phase 2 that would build on these essential design principles that would result in a coherent development across the two Phases.
- 7.107 Details of the external finishes, including materials, balconies, privacy screens, windows, etc. would be secured by condition to ensure that a high design quality is maintained and that the elements that make the scheme acceptable in urban design terms are reflected in the completed development.

Summary

7.108 It is considered that the development will deliver a high quality residential-led scheme, providing enhanced connectivity across the site to and from Lampton Park, within a landscaped setting that bring the features of the park through the site. Despite the relatively high scale of the development in comparison to surrounding developments, it is considered that its form and massing responds well to the local context and that, through a number of means of articulation, the scale has responded to the sensitive boundaries to minimise the impact on the prevailing character of the area. The taller elements of the scheme have been positioned towards the centre of the site or fronting directly onto the park, assisting legibility through the site and helping to act as way-markers within the development. The range of building types proposed across the development, as shown in Phase 1 which would help establish the principles for the later phase, helps reinforce local distinctiveness and character, reflecting the diverse nature of surrounding developments. The retention of significant areas of mature landscaping will help integrate the development with the surrounding area, in particular along the Lampton Road frontage and the park fringes. Furthermore, whilst building heights and the overall scale of the development may be greater than those identified in the adopted Planning Brief for the site, this should be seen in the context of the wider benefits of the scheme, in particular the delivery of much needed housing within the Borough, including a substantial (40%) proportion of affordable housing that may not otherwise have been deliverable. As such it is considered that the proposal would be in accordance with the NPPF, the London Plan and the adopted Local Plan.

Impact on neighbouring land uses

Daylight, Sunlight & Overshadowing

- 7.109 A Daylight, Sunlight, Overshadowing and Light Pollution chapter has been included within the Environmental Statement submitted with the application. The assessment was undertaken following the BRE Guidelines and focuses on the residential buildings surrounding the site which would have the potential to be affected by the proposed development. The 2011 BRE Handbook states *“Adverse impacts occur when there is a significant decrease in the amount of skylight and sunlight reaching an existing building where it is required, or in the amount of sunlight reaching an open space. The assessment of impact will depend on a combination of factors, and there is no simple rule of thumb that can be applied.”*
- 7.110 In view of the above, the interpretation of the daylight and sunlight results must be assessed in terms of the quantum of light lost or gained, not purely on the percentage of change. The percentage value may well be misleading, particularly where the baseline values are large. In these situations, a small change in the quantum of light could represent a high percentage change in the overall figure, implying that there would be a significant change in daylight and sunlight whereas in reality the difference would be negligible.
- 7.111 London Plan Policy 7.6 states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and micro-climate.
- 7.112 The Local Plan expects developments to meet the design standards set out in Building Regulations and expanded upon within detailed supplementary

guidance documents, including, but not limited to, demonstrating compliance with prevailing daylighting standards (BRE Guidance 2011).

- 7.113 The properties most likely to be affected by the proposal in terms of daylight, sunlight and overshadowing at those to the north along Neville Close (nos. 43-55 in particular) and to the east along Lampton Road (nos. 87-119), including Alexandra Court. The assessment also included properties to the south of the site (nos. 82 and 84 Lampton Road).
- 7.114 Two scenarios have been modelled in the ES; the existing baseline versus Phase 1 and the existing baseline including Phase 1 versus Phase 2. The baseline analysis showed that there is a high level of daylight and sunlight amenity and that all surrounding amenity spaces received at least 2 hours of sunlight to over 50% of the area. There are 270 windows serving 200 rooms surrounding the application site and these were assessed in terms of both VSC and NSL (daylight) and 132 windows serving 71 residential rooms surrounding the application site that are relevant to the sunlight amenity assessment (APSH). There are 16 areas of amenity space surrounding the site that are relevant to overshadowing assessment.

Existing baseline v Phase 1

- 7.115 Only 6 of the windows tested would fail to meet the VSC BRE Guidelines; of these 4 would see a loss of 20-29% and 2 would see a loss of >40%. These windows are at nos. 82 and 84 Lampton Road. Only 2 windows would fail to meet the NSL BRE Guidelines, 1 would see a loss of 20-29% and the other a loss of 30-39% (at no. 82 Lampton Road).
- 7.116 In terms of impact on no. 82 Lampton Road, there are 4 windows serving 4 rooms facing the application site. Based on the information submitted, only 1 of the rooms are likely to see a significant change to their daylight amenity that would be noticeable to occupants (this would be a VSC change of 0.96% beyond BRE Guidelines and an NSL change of 31%). However, it should be noted that this window faces towards a pathway between a neighbouring property and is served by a small window, most likely to be a downstairs bathroom rather than a principal living space.
- 7.117 All of the rooms assessed for sunlight amenity would meet the BRE Guidance.
- 7.118 All of the amenity areas assessed would be BRE compliant in terms of overshadowing; only two areas would see any change, with these experiencing a 0.39% and 0.54% change.

Existing baseline including Phase 1 v Phase 2

- 7.119 Twenty-four windows tested would fail to meet the VSC BRE Guidelines; of these 20 would see a loss of 20-29% and 4 would see a loss of 30-39%. The most affected properties are located within Neville Close (nos. 43-46 experiencing the greatest changes in VSC), whilst no. 125 Lampton Road would also experience some change. All of the windows tested would meet the NSL BRE Guidelines.
- 7.120 All of the rooms assessed for sunlight amenity would meet the BRE Guidance.

- 7.121 All of the amenity areas assessed would be BRE compliant in terms of overshadowing; 6 areas would see some change with the least being a 0.02% change and the most being an 11.69% change.
- 7.122 Given that a significant majority of windows and rooms would continue to meet the BRE Guidelines for both daylight and sunlight amenity, it is not considered that the proposed development would have a significant, unacceptable impact on surrounding residential properties. Furthermore, it is noted that where reductions in daylight are observed, this may be as a consequence of the open nature of parts of the site at present and potentially the higher-than-usual levels of daylight and sunlight being received by these properties. In relation to overshadowing, it is not considered that the proposal would result in an unacceptable level of overshadowing of surrounding properties and would be broadly in compliance with the BRE Guidelines and adopted policy.

Overlooking

- 7.123 The nearest existing residential properties to Phase 1 are located immediately to the south of the site (no. 84 Lampton Road) and on the opposing side of Lampton Road. The properties closest to Phase 2 are located on Neville Close to the north.
- 7.124 Where windows would face across Lampton Road as part of Phase 1, these would be some 38m from properties on the other side of Lampton Road. No habitable room windows would directly face the existing habitable room windows of no. 84 Lampton Road, noting in particular the bedroom window located in the dormer on the northern elevation of this property and the substantial distance (38m+) between the rear elevation of this property and Block A.
- 7.125 The nearest building shown on the illustrative scheme to the properties fronting Neville Close would be some 26m away. The final design and layout of these blocks and individual windows is unknown, but the principle of this relationship is not considered to be unacceptable.
- 7.126 Overlooking may result from the use of roof terraces and balconies, but it is considered that since these would be at a high level and a significant distance from neighbouring properties and their gardens, with screening and set-backs, they would not result in an unacceptable loss of privacy for residents and consequently would be acceptable. Planting and appropriate boundary treatments would be provided to the edges of podium communal amenity areas where these abut neighbouring residential properties (i.e. Block A and its relationship with no. 84 Lampton Road). Presently, the details show a boundary wall 1.1m in height along the boundary between Block A and no. 84 and as such it is considered additional planting or other boundary treatments be provided along this boundary in order to protect the amenity of adjoining residents. This would be secured by condition.

Outlook

- 7.127 The design and external appearance of the proposed development has been assessed in detail in the preceding section on Urban Design.

- 7.128 It is noted that properties surrounding the application site at present generally enjoy an open outlook given the location of the existing Civic Centre building, and enjoy views towards mature tree planting that forms a boundary around much of the site.
- 7.129 The proposed development has been sited to minimise the impact on neighbouring residents in terms of outlook, in particular with the retention of a significant proportion of the mature trees that are located along the northern and eastern boundary of the site and provide substantial screening for existing residents to the north and east. Furthermore, the separation distances to these properties (c. 28m and 38m respectively) would ensure they would continue to have a satisfactory outlook.
- 7.130 To the south, no. 84 Lampton Road would be most affected by the proposed development, in particular in regards to the siting of Block A. This part of the development would be positioned 1.5m from the boundary with this property and would start at 3 storeys (11.5m) at the front and rise up to 4 storeys at the rear (14.6m) separated by a 4.5m high wall running the length of the boundary between these two blocks, which forms the external wall to the undercroft car park and podium communal amenity space. The front of Block A would start approximately in line with the rear elevation of this property and extend almost the full length of the rear garden. It is noted that there is currently a single-storey garage/outbuilding to the rear of this property close to the northern boundary and a single-storey conservatory has been built to wrap around the side/rear elevation, separated some 2m from the northern boundary.
- 7.131 The proposal would be a dominant feature when viewed from the rear garden of this property, in particular the high walls of the gable ends of the front and rear blocks. The set in of 1.5m from the boundary would give some relief to occupants from the scale of the buildings along this boundary which would also be further mitigated by the orientation of the site to the north of this property and the substantial length (nearly 70m) and westerly orientation of the rear garden of this property, where the open character of Lampton Park beyond would be unchanged. The separate four-storey 'mansion' to the front of Block A would be some 12m from the flank wall of this property, which is considered to be an appropriate separation distance between properties and is not an uncommon relationship along this stretch of Lampton Road.
- 7.132 Elsewhere the massing of the development has been broken up with various set-ins and steps in building line, as well as the use of features such as balconies, in-set and projecting, to ensure the development would not result in a monolithic, overbearing feature from the surrounding properties. Further afield, it is considered that the impact of the development on residential amenity in terms of outlook would diminish, and whilst it would remain a highly visible feature from longer views across the park, it is not considered that it would have an unacceptable impact on neighbouring residents' outlook. Furthermore, the development would be finished to a high design standard and would introduce areas of landscaping across the site, including areas of planting both within and around the fringes of the site, helping to soften the visual appearance of the development from the surrounding properties.
- 7.133 It is therefore considered that whilst the proposal, in particular the siting of

Block A and its layout and proximity to the southern boundary with no. 84 Lampton Road, would have a significant impact on residents' outlook from this property, this would be localised to the one property and should be viewed in the context of the development as a whole and the significant contribution the proposal would make towards housing delivery in the Borough, including a substantial provision of affordable housing. Furthermore, such relationships are not unusual in an urban environment where previously developed sites have close boundary relationships with existing residential properties.

Noise and general disturbance

- 7.134 The proposed development has the potential to increase noise and disturbance to surrounding residential properties. Consideration has been given to the potential impacts within the Noise and Vibration chapter of the Environmental Statement. As part of this, the effects of road traffic noise and building services plant noise were assessed. It concludes that these effects would likely have a negligible effect on the nearest sensitive receptors (i.e. residential properties) and provides recommended operational noise limits that would ensure that there would be minimal impact from these sources as a result of the development. Changes in traffic flows as a result of the development are unlikely to have a significant impact on road traffic noise, with all changes predicted to be below the Significant Observed Adverse Effect Level (SOAEL) identified in the PPG. Any additional plant would require prior approval from the Local Planning Authority and would need to meet the recommendations of both Local Plan Policy EQ4 and BS4142:2014.

Summary

- 7.135 It is therefore considered that whilst the proposal would impact neighbouring residential properties in terms of daylight and outlook, it is not considered that these would result in an unacceptable impact on amenity that would sufficiently outweigh the benefits of this proposal in terms of the key objectives for the redevelopment of this site and the significant contribution the scheme would make towards the delivery of new housing in the Borough and in particular affordable housing. As such, it is considered that the proposal would broadly be in accordance with the NPPF, London Plan and adopted local policies.

Transport and Access

Policy Context

- 7.136 The NPPF requires all developments that generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment. Decisions should take account of whether:
- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
 - Safe and suitable access to the site can be achieved for all people; and
 - Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development

should only be presented or refused on transport grounds where the residual cumulative impacts of the development are severe.

7.137 Paragraph 37 states that: *“By encouraging a mix of land uses in an area, planning policies can encourage the minimisation of journeys undertaken through the provision of residential, employment, retail and leisure land uses within easy reach of each other.”*

7.138 The London Plan recognises that transport plays a fundamental role in addressing the whole range of his spatial planning, environmental, economic and social policy priorities. It is critical to the efficient functioning and quality of life of London and its inhabitants. It also has major effects - positive and negative - on places, especially around interchanges and in town centres and on the environment, both within the city itself and more widely.

7.139 Policy 6.1 emphasises the importance of closer integration of transport and development and seeks to achieve this by (inter alia):

- *Encouraging patterns of development that reduce the need to travel, especially by car;*
- *Seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand;*
- *Supporting development that generates high levels of trips only at locations with high levels of public transport accessibility, either currently or via committed, funded improvements;*
- *Improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London;*
- *Facilitating the efficient distribution of freight whilst minimising its effects on the transport network;*
- *Supporting measures that encourage shifts to more sustainable modes and appropriate demand management;*
- *Promoting greater use of low carbon technology so that carbon dioxide (CO₂) and other contributors to global warming are reduced;*
- *Promoting walking by ensuring an improved urban realm; and*
- *Seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable.*

7.140 Policy 6.3, regarding the effects of development on transport capacity, highlights that new developments that will give rise to significant numbers of new trips should be located where there is already good public transport accessibility with capacity adequate to support the additional demand.

7.141 Policy 6.7 sets out a number of requirements for new developments in respect of cycling, as follows:

- *provide secure, integrated and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3,*
- *provide on-site changing facilities and showers for cyclists,*
- *facilitate the Cycle Super Highways shown on Map 6.2,*
- *facilitate the central London cycle hire scheme.*

- 7.142 Regarding parking, Policy 6.13 states that an appropriate balance must be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. New developments should not only adhere to the maximum car parking standards set out in Table 6.2 of the London Plan, but also meet the minimum disabled and cycle parking standards specified. In addition, new developments should ensure that 1 in 5 provide an electrical charging point to encourage the uptake of electric vehicles, with an additional 20% to be provided in the future.
- 7.143 Policy EC2 (Developing a Sustainable Local Transport Network) of the adopted Local Plan has regard to transportation and seeks to secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being. It echoes the London Plan in terms of standards established for car parking, cycle parking, motorcycle parking, coach parking, and electric vehicle charging, along with any additional standards set out in supplementary guidance.
- 7.144 As described previously, the site has moderate PTAL rating reflecting its location close to Hounslow town centre and a range of public transport nodes, but not within this highly accessible central area. As a consequence, the scheme should seek to maximise the use of sustainable modes of transport (i.e. cycling, walking, bus, underground) given the level of new residential accommodation proposed. However, it is also acknowledged that as an outer London Borough and not within one of the main town centres, it is reasonable to provide some level of residential parking on-site. As such, it is important to strike a balance between parking provision, and inevitable associated vehicle movements, and reliance on sustainable transport modes to serve the transport needs of the site.

Highway status and access

- 7.145 Lampton Road is classified as the A3005 and links Hounslow Town Centre to the A4 Great West Road, and Heston and Southall further north.
- 7.146 Clovelly Road at the southern end of the site is an adopted public highway and provides vehicular and pedestrian access to visitor car parks for the Civic Centre, conference centre and the Registration Service. Only the carriageway is adopted highways, however. There is a private unadopted footpath leading to Lampton Park.
- 7.147 There is an adopted public right of way (Short Hedges) running east to west across the northern end of the site. The site is also criss-crossed by a number of unadopted footpaths that are privately maintained. This includes a shared footpath/cyclepath running north to south along the western boundary of the site.
- 7.148 A second vehicular access at the northern end of the site provides access to a service yard and a multi-storey staff car park. There is a right-turn pocket on Lampton Road and a left-turn slip lane that improves access to the site. The car park has approximately 590 spaces. A separate access is provided to the H20 bus stand but this is separated from the main access. This access is not adopted as public highway.

7.149 There are 3 direct pedestrian entrances to the site from Lampton Road, all of which are unadopted and privately maintained.

Accessibility

7.150 The site is located within an area of average public transport accessibility and has a PTAL score of 3 which is classed as moderate on a scale of 1-6.

7.151 The most southerly part of the site is located approximately 250m from Hounslow Central Station. The most north-westerly part of the site is approximately 550m away. There are north and southbound stops on Lampton Road serving the 120 and H20 routes. There is a bus stand and stop for the H20 within the site. The 120 runs between Hounslow and Northolt via Southall. The H20 runs between the Civic Centre and Twickenham.

7.152 Hounslow Town Centre is between 500-750m to the south of the site which provides all town centre amenities including numerous additional bus routes to a variety of destinations.

7.153 There is a small parade of shops located opposite Hounslow Central station that meets every-day needs.

Proposed vehicular access

7.154 It is proposed to retain vehicular access to the site in the current locations but with a third access road also be provided. The northern access will accommodate two-way traffic, a new central access would be in-only, and the southern access would be exit-only for deliveries and buses. Until the northern access is completed as part of Phase 2 the southern access would need to allow all traffic to exit.

7.155 Access to Phase 1 would be provided from the new central access road which is located mid-way along the site frontage to the north of the existing bus stop on Lampton Road. This would be an in-only road. Egress from the site until the new northern access road is completed will be from Clovelly Road although some minor changes to the road alignment within the site are required.

7.156 The existing northern access will be improved as part of the Phase 2 works. The left turn slip lane and right turn pocket will be removed because they will no longer be required and the Lampton Road kerb realigned. Visibility splays have been provided and these meet minimum requirements. This would then form the main vehicular access to the site.

7.157 The existing bus stand will be relocated to the southern end of the site. This has been agreed in principle with TfL.

7.158 The new central access road will require relocation of the existing bus shelter at the Lampton Road bus stop (but not the stop itself) to the south. Discussions have taken place with TfL and the principle agreed. This road will provide access to the new bus stand and for deliveries to the commercial unit in 88 Lampton Road. These vehicles will exit using the southern access. All movements have been tracked and this arrangement is considered to be acceptable in principle.

- 7.159 The southern access road will follow the line of Clovelly Road. It will be exit-only for buses and delivery vehicles serving 88 Lampton Road as well as refuse vehicles serving the properties at the southern end of the site. All car-borne traffic will need to exit the site from the northern access road. This will reduce accessibility by car but the number of properties which will have car parking accessed from the southern road is limited. It is intended that this road will mainly be a pedestrian and cycle route providing good access to the park from Lampton Road and to the tube station and town centre from the development.
- 7.160 All three access roads will be provided with footways allowing easy and convenient pedestrian access. Access to the existing public footpath at the northern end of the site will also be retained, albeit reconfigured to accommodate the layout of Phase 2 at this portion of the site.

Proposed site layout

- 7.161 The site has been designed to provide maximum accessibility. The road layout has been tracked and is acceptable in principle. However, some of the swept paths are close to kerb lines and parking bays so there may need to be some slight amendments to the details. It is proposed that all roads within the site are adopted as public highway so any such minor amendments can be dealt with when detailed construction drawings are submitted as part of the S.38 agreement. This situation is not uncommon.
- 7.162 The layout ensures that pedestrian desire lines to the south of the site, towards the tube station and town centre, are provided. This is essential in seeking to promote sustainable transport.
- 7.163 The existing Short Hedges public footpath and cyclepath along the northern edge of the site will need to be realigned but will not be removed. Part of the existing route will need to be stopped up and diverted to the south of Block E in Phase 2. This will require separate statutory consultation. Access will be retained to the temple, Neville Close and the existing paths to the north and west of the site.

Parking provision

- 7.164 It is proposed that 441 car parking spaces for the 940 residential dwellings will be provided on-site. This is a ratio of 0.47 parking spaces per dwelling and is consistent with both Local Plan and London Plan parking standards and the general approach to promoting sustainable travel.
- 7.165 The majority of these parking spaces will be provided in undercrofts within all of the blocks with 105 parking spaces provided on-street. Two car club parking spaces will be provided. It is currently proposed that there will not be any dedicated loading bays, with deliveries to residential properties taking place on-street. The majority of streets are designed to accommodate two-way traffic so this would not be unacceptable. Some of the streets are narrower, however, so a review of loading facilities will need to take place during detailed design. However, the number of deliveries to residential properties is not so significant that this would cause obstruction.
- 7.166 A total of 66 parking spaces will be provided in Phase 1 (a ratio of 37%) with the remainder provided in Phase 2.

- 7.167 The London Plan (2015) requires an adequate number of disabled parking bays to be provided and a total of 10% of the overall provision will be disabled accessible. The roads would be adopted as public highway so Blue Badge holders could be provided with disabled parking bays if required.
- 7.168 The London Plan (2015) requires 20% active provision for EV charging points and 20% passive provision and this will be provided and secured within the car park management plan condition. Monitoring of uptake will be required so that passive charging points can be brought into use when required.
- 7.169 All parking bays, both on-street and off-street appear to meet minimum standards in terms of size and accessibility. The on-street parking bays are set into laybys so that the main roads would not be obstructed by parked cars.

Parking impact

- 7.170 The ratio of parking to dwellings means that only 48% of residents would be able to obtain a parking space. The majority of the parking spaces would be located in off-street car parks and therefore privately managed. Allocation of these parking spaces will be covered by a Car Park Management Plan which should seek to maximise the use of parking spaces. This will be secured by condition.
- 7.171 On street parking would not be allocated to specific dwellings. However, the roads will be adopted as public highway and it is proposed that the site is covered by a new and separate CPZ. This would ensure that residents would not be eligible to obtain parking permits in existing CPZs. This would be secured in the S.106 such that the CPZ is in place prior to first occupation of the relevant phase of development.
- 7.172 Neville Close, Brookwood Road, Lampton Avenue, Sutton Dene, Highlands Close and Berwyn Avenue to the north of the proposed development are currently not included within a CPZ. It is recommended that a S.106 contribution of £18,000 towards consultation and potential implementation of a CPZ is secured as part of the planning permission. If controlled parking were to be introduced on those streets it would ensure that the impact of the proposed development would be minimised.
- 7.173 Funding was secured under the High Street Quarter consent for a review of the CPZ hours for the adjoining Hounslow Town Centre North CPZ.
- 7.174 Car ownership figures indicate that likely levels of car ownership would be higher than the number of parking spaces proposed. However, an investigation of car ownership in the Census Output Areas covering the town centre, where there are a higher number of flats, shows that car ownership is lower in these areas compared to surrounding areas where there is a low percentage of flats. It will be important that this is marketed as a car-free development to ensure that future residents are aware of the restricted parking. Measures to try to reduce the need to own and run a car would be secured as part of a permission including a Travel Plan, Sustainable Travel Vouchers for each dwelling, and an on-site car club including two car club parking spaces.

Trip Generation

- 7.175 The applicant has assessed the trip generation impacts of the proposed development, comparing it to the existing use of the site as the Civic Centre. Staff surveys and traffic counts have been used to provide figures for the existing trip generation. The TRICS database has been used to predict the residential trip generation and this is considered to be acceptable and is standard practice.
- 7.176 Surveys indicate that the existing Civic Centre generates approximately 3,100 trips per day. The majority of these (43%) are car borne trips and given that there is a c.590 space car park on the site this is not unexpected. However, there are a significant number of other trips including 13% bus, 14% tube, 6% train, 9% cycle, 12% walk.
- 7.177 Traffic surveys counted 237 arrivals in the am peak hour (8-9am) with 660 total vehicle movements in the three hours between 7-10am. In the pm peak (5-6pm) the total number of departures was 185 with a total of 537 vehicle movements in the three hours between 4-7pm.
- 7.178 The TRICS surveys indicate that future total daily trip generation could be 4,434 which is an increase of approximately 1,300 trips over the course of a day. In the AM peak, however, there would be a reduction in the number of vehicular trips by approximately 180 and in the PM peak by 115 trips.
- 7.179 Peak hour bus trips are estimated to be 167 in the AM peak and 178 in the PM peak. Rail/tube trips are estimated to be 91 in the AM and 71 in the PM.
- 7.180 For the purposes of assessment, the impact in the peak hours has been considered.

Traffic impact

- 7.181 The assessment of traffic impact has taken into account the High Street Quarter development as well as the proposed new Civic Centre at Bath Road. It can be seen that compared to the existing use of the site there will be a reduction in traffic at peak hours. The site accesses have been modelled and are predicted to operate within capacity at all times. TfL has assessed the impact of the traffic generation on the wider network and considers that no mitigation measures are required.
- 7.182 It is acknowledged that there is likely to be an increase in traffic on the surrounding road network as a result of the High Street Quarter development. That impact was modelled and assessed and appropriate mitigation measures secured as a result of that planning permission, including improvements to the Lampton Road/Balfour Road junction. The redevelopment of the Civic Centre site should lead to a small improvement in traffic flows on Lampton Road as a result of the reduced peak hour traffic flows.
- 7.183 TfL requested an additional assessment of traffic impact when Phase 1 is completed but the Civic Centre is still operational. Phase 1 of the development is only predicted to generate 19 vehicular trips in the AM peak and 14 in the PM peak, with 206 daily trips. The Council is implementing a combination of measures that will mean traffic generation will reduce in the period up to July 2018 when staff are expected to transfer to the new Civic Centre. This includes introduction of "Worksmart" which includes more flexible working, and a reduction

in the number of available parking spaces. The impact of this scenario, therefore is not considered to be significant and TfL is satisfied that there will not be a wider impact on the network.

Public transport impact

7.184 The applicant has submitted an assessment of the demand on public transport services and capacity as a direct result of the proposed development. This compares the existing number of public transport trips generated by staff at the Civic Centre to the estimated number of future trips. It is predicted that there would be a daily increase of approximately 700 bus trips but a small reduction in the number of tube trips. In the peak hours, the increase in bus passengers is less than 100 and TfL consider that the impact on bus and tube services will not be significant and they do not require specific mitigation measures.

Servicing

7.185 A loading bay is proposed to be provided for the commercial unit at 88 Lampton Road. This is considered to be acceptable in principle but the detailed design should be secured by condition.

7.186 No specific provision will be made for the residential dwellings but the majority of streets are wide enough to allow delivery vehicles to park on the carriageway without blocking other vehicles. Some streets will not accommodate two-way traffic and therefore the final design of these areas may require the provision of loading bays. However, this can be dealt with during the detailed design of the road layout as part of a S.38 agreement and is not uncommon.

7.187 Refuse will be collected from on-street and is considered to be acceptable.

Cycle storage

7.188 The proposal includes provision of 1,513 cycle parking spaces which meets London Plan cycle parking standards.

7.189 Cycle parking must be located in easily accessible locations close to residential cores and entrances to buildings. It must be covered and secure and stores must be of a reasonable size and not contain too many cycle stands. Internal and external access to the stores should be provided wherever possible.

7.190 Cycle parking for Phase 1 has been amended following officer comments but the use of semi-vertical stands is proposed and this is not considered to be acceptable. Provision of vertical or semi-vertical cycle stands is not acceptable because they are not necessarily useable by all residents and therefore not fully accessible. Cycle stands must either be Sheffield stands or Josta systems. Therefore, further details of the cycle parking for Phase 1 (Blocks A & B) will be required. Details of cycle parking for Phase 2 will need to be submitted and approved prior to commencement of that phase.

Travel Plan

7.191 A Residential travel plan will be required and this will be secured in the S.106 agreement. A draft has been submitted and the final version will be submitted

and approved prior to first occupation. This will be in accordance with current council and TfL guidance. Measures to promote sustainable travel will be needed given the parking ratio, but also to make the most of the location.

Construction

7.192 A Construction Logistics Plan has been submitted and is considered to be acceptable. This is to be secured by condition. All construction vehicles will be routed to the A4 northwards along Lampton Road, delivery hours will be restricted to avoid peak hours and school closing times. Liaison will be required with other contractors in the area including the new Civic Centre and High Street Quarter to minimise the impacts.

Conclusion

7.193 On balance it is considered that a satisfactory level of parking would be provided, taking account of the site's location, its accessibility by a range of public transport modes and the measures that are proposed to promote a modal shift away from the use of private cars, including a substantial provision of cycle parking. These factors would ensure that the proposed development would not harm the safe and efficient use of the local road network or parking availability on surrounding residential roads.

7.194 Subject to further details to be secured by condition, it is considered the proposal would be acceptable in highway safety terms and would not prejudice the safety of pedestrians or other road users.

7.195 Furthermore, with the mitigation measures detailed above secured within the S.106 and S.278/S.38 agreements and contributions from CIL, the scheme would be in compliance with the objectives and policies of the NPPF, the London Plan and the adopted Local Plan as identified above.

Energy & Sustainability

7.196 The broad aim of sustainable development is to ensure that the quality of social, economic and ecological environments are improved and maintained for future generations. The London Plan and Local Plan encourage sustainable development through many policies including promoting the use of energy efficient building design and materials, re-use of previously developed land and existing buildings, and location of development in or close to town centres and areas with good public transport. Sustainability is also a clear thread running through the NPPF.

7.197 Sustainability underpins many London Plan and local policies. These require developments to be sustainable in transport terms, to minimise waste, include energy efficiency measures and promote use of renewable energy, and not significantly increase the requirement for water supply or surface water drainage.

7.198 As a comprehensive new development, the proposal can make a substantial contribution to sustainable development in the Borough and it is important that it recognises and adopts sustainable development principles.

7.199 The proposal constitutes the redevelopment of a previously developed site and in

this instance is in accordance with sustainable development principles.

7.200 London Plan Policy 5.2 (Minimising carbon dioxide emissions) requires developments to make the fullest practicable contribution to minimising CO₂ emissions following this energy hierarchy:

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

7.201 It goes on to note that major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions' reduction outlined above are to be met within the framework of the energy hierarchy.

7.202 The Mayor aims to ensure that major developments reduce carbon dioxide emissions from buildings, by reaching higher than the Target Emission Rate (TER) outlined in the national Buildings Regulations, leading to zero carbon residential buildings from 2016. The Mayor has stipulated that between 2010 and October 2013 residential buildings should provide a 35% improvement on 2013 Building Regulations'.

7.203 Policy EQ1 of the Hounslow Local Plan seeks to minimise the demand for energy and promote renewable and low carbon technologies and Policy EQ2 aims to promote the highest standards of sustainable design and construction in development.

7.204 An Energy Strategy has been submitted in support of the application demonstrating how the proposals would accord with the energy hierarchy contained in the London Plan and has been based on the illustrative scheme submitted. This identifies that a 35% CO₂ emissions reduction could be achieved over Building Regulations Part L 2013 by reducing the energy use ('Be Lean') and an on-site district heat network ('Be Clean'). The assessment shows that in terms of CO₂ emissions reduction there is the potential to:

- Specify energy efficiency and passive design measures ('Be Lean') with the associated CO₂ savings of the site-wide development being c.108 tonnes over the baseline scheme; and
- Incorporate a CHP unit that would supply the majority of the heating and domestic hot water demand of the development to achieve additional CO₂ savings over the 'Be Lean' scheme

7.205 Owing to the hybrid nature of the application, it should be noted that the submitted assessment focuses on the complete development's performance rather than each phase individually. The energy consumption and CO₂ emissions of the site and the individual phases are thus based on the site-wide projected strategy, which is yet to be finalised given that the greater proportion of the development is at the Outline stage.

7.206 In terms of Phase 1, through the implementation of energy efficiency measures ('Be Lean') a CO₂ emissions reduction of 5% can be achieved, with the remaining reductions being secured through the installation of an on-site CHP ('Be Clean'). These details would be secured by condition.

- 7.207 It is noted that there is the potential for the site to be future-proofed for the connection to a feasible district heating network in the future. This would be secured by condition.
- 7.208 In terms of water use, the applicant has submitted information to demonstrate that the dwellings will have a maximum internal water consumption rate of 105 litres/per person/per day. These details would be secured by condition.
- 7.209 In terms of construction materials, the now redundant Code for Sustainable Homes Level 4 had requirements that all building materials for roof, external walls, internal walls, upper and ground floor and windows have rating of D and higher in 'The Green Guide'. These details will be secured by condition.
- 7.210 The Council's Sustainability consultants (CEN) have reviewed the information submitted and conclude that the development would meet the policy requirements in respect of reducing CO₂ emissions and sustainability. Therefore it is considered that the overall strategy proposed would ensure that the scheme would meet the sustainability targets set in the London Plan and the adopted Local Plan.
- 7.211 The GLA have reviewed the climate change information and have commented that the CO₂ savings (as demonstrated within the Energy Strategy) achieve the targets in London Plan Policy 5.2; this is welcomed.

Other environmental considerations

Archaeology

- 7.212 The objective of Local Plan Policy CC4 (Heritage) is to conserve, protect and enhance the archaeological heritage.
- 7.213 The site is not within an Archaeological Priority Area as defined by the adopted Local Plan.
- 7.214 A Historic Environment Assessment of the site was undertaken to inform the adopted Planning Brief by MOLA. This concluded that there is moderate potential for post-medieval remains, but that such remains would be of low heritage significance. Past archaeological investigations have revealed no evidence of prehistoric activity, but these have mostly been undertaken some distance from the site. There is low potential for archaeology dating from the Roman period. It is likely that the archaeological survival potential will have been compromised across much of the site due to the presence of the existing basement associated with the Civic Centre building. Elsewhere, survival potential is moderately high.
- 7.215 The assessment recommends that archaeological monitoring of any preliminary geotechnical boreholes/trial pits is carried out to confirm the presence of archaeological remains and from such results evaluation trenches may be required to confirm the significance of any assets. It is considered necessary to include a condition securing approval of a Written Scheme of Investigation (WSI).

Flooding

- 7.216 The NPPF confirms that development should take full account of flood risk and suggests that new development should seek to reduce the cause and impacts of flooding.
- 7.217 London Plan Policy 5.3 states that major developments should ensure efficient use of nature resources (including water). Policy 5.12 confirms that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF. Policy 5.13 states that developments should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible as set out in the drainage hierarchy.
- 7.218 Local Plan Policy EQ3 confirms development proposals must include a Flood Risk Assessment (FRA) consistent with the requirements of the Environment Agency and the Strategic Flood Risk Assessment and recommends that developments incorporate sustainable urban drainage systems and avoid non-permeable hard standings with the aim of achieving greenfield runoff rates.
- 7.219 The site is in Flood Zone 1, with some minor elements of surface water flood risk. The submitted FRA acknowledges the site is within Flood Zone 1 and the consequential very low risk of the site to flooding from fluvial and tidal sources. The risk from other sources (surface/ground water) is also identified as low.
- 7.220 The proposal will significantly alter the impermeable area of the site and the anticipated increase in surface water runoff will be dealt with via a range of mitigation measures. Off-site discharge to the public sewer will be restricted to 50% of the pre-development runoff rates with SUDS features designed to attenuate surface water up to the 1 in 100 year (plus climate change) event on site.
- 7.221 Responsibility for managing surface water flooding and other flood events passed from the Environment Agency to Lead Local Flood Authorities (LLFA) in April 2015. The Council's Flood Risk Management Consultant has reviewed the submitted information and notes that runoff rates will be restricted (66.9l/s) to provide more than 50% betterment of the existing peak runoff rate from the site and with at least 2,490m³ of on-site storage being provided this will be acceptable. Above ground SUDS features will also be provided across the site, as well as rainwater harvesting measures to ensure the proposals comply with the drainage hierarchy in London Plan Policy 5.13. These details will be secured by condition, including a detail routine maintenance plan for the overall drainage system.

Contaminated land

- 7.222 Owing to the history of uses, there may be some contamination. The NPPF advises where there is suspicion, or where evidence suggests there may be some contamination, planning permission may be granted subject to condition that development may not start before site investigation and assessment have been done and that the development itself will incorporate any remedial measures necessary. Policy 5.21 (Contaminated Land) of the London Plan and adopted Local Plan Policy EQ8 (Contamination) provide a policy context for this matter. A condition is proposed to ensure that, provided the appropriate

mitigation measures are implemented, there would be no risk of contamination.

Air Quality

7.223 The NPPF states that (para 109) *“the planning system should contribute to and enhance the natural and local environment by.... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.”*

7.224 London Plan Policy 7.14 (Improving Air Quality) states that development proposals should:

- Promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following the best practice guidance in the GLA and London Councils’ ‘The control of dust and emissions from construction and demolition’;
- Where biomass boilers are included, set out a detailed air quality assessment that should forecast pollutant concentrations. Permission should only be granted if no adverse impacts from biomass are identified; and
- Aim to be ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs).

7.225 The Borough has undertaken a review and assessment of air quality as required by the Environment Act 1995. This has concluded that the level of pollution (the air quality objective for 2005 for nitrogen dioxide) will not be met and led to the declaration of Air Quality Management Areas (AQMAs).

7.226 The application site is within the AQMA that covers the whole Borough and by definition suffers from poor air quality. Thus, careful consideration needs to be given to granting planning permission for residential accommodation, particularly to the type of accommodation where people may have very little choice in the location. However, AQMAs do not differentiate levels of pollution between different areas and, in reality, there may well be differences on the ground. Whilst the designation of an AQMA is indicative of a certain level of air quality, this in itself does not prevent development in such areas.

7.227 Local Plan Policy EQ4 (Air Quality) states that the Council’s objective is to seek to reduce the potential air quality impact of development, in line with the Air Quality Action Plan, and that development proposals are expected to carry out air quality assessments for major developments and consider the potential impacts of air pollution from the development on the site and neighbouring areas and incorporate mitigation measures where air quality assessments show that developments could cause or exacerbate air pollution, or where end users could be exposed to air pollution.

7.228 The air quality implications of the proposed development have been assessed as part of the Environmental Statement.

7.229 It is recognised that this is a high-density development located within an urban

area that would provide a significant number of parking spaces and associated trips to the site. On the other hand, the recycling of previously developed land for mixed use development coupled with enhanced cycling measures and good accessibility to public transport has the potential to produce fewer traffic related pollutants to air quality than a less dense greenfield site.

- 7.230 In terms of the development's impact on the wider area, the Air Quality chapter of the ES concludes that the development would not expose future residents to unacceptable levels of NO₂ or PM₁₀ for both Phases of the development and as such no mitigation (in the form of mechanical ventilation for example) is required. Although it is noted that due to the surrounding noise environment, such ventilation may be required to achieve acceptable levels of internal noise.
- 7.231 The Air Quality report recognises that there is the potential for exposure to PM₁₀ during the construction phase of the development, although it is noted that this will be temporary in nature and short-term as they will only arise at particular times when certain activities and metrological conditions combine. However, through the application of dust control and mitigation measures described in the report, it is not considered there will be significant impacts on local residents. It is expected that there will be a low number of HDV trips during the construction phase and as such air quality from road vehicle exhaust emissions is not considered to be significant.
- 7.232 The change in vehicular trips arising from the development has been predicted to have a negligible impact on annual mean NO₂ and PM₁₀ concentrations for both Phases. Furthermore, the potential air quality impacts associated with the energy centre has been undertaken and indicates that no exceedences of the annual mean NO₂ were predicted.
- 7.233 Notwithstanding the above, it should be noted that the proposal would include a Travel Plan which would use measures to encourage a modal shift (encourage people to use sustainable modes of transport rather than private vehicles) as well as measures to encourage cycling (providing a good level of cycle facilities for future residents and visitors), which would mitigate any potential air quality impacts.
- 7.234 It is therefore considered that the proposed development would be acceptable in respect of potential impacts on air quality and would be in broad compliance with the NPPF, the London Plan and adopted local policies, as identified above.

Ecology & arboricultural assessment

- 7.235 At a national level, the NPPF states that the planning system should contribute to and enhance the "*natural and local environment by:*
- a) *Protecting and enhancing valued landscapes, geological conservation interests and soils;*
 - b) *Recognising the wider benefits of ecosystem services;*
 - c) *Minimising impacts on biodiversity and providing net gains in biodiversity, where possible contributing to the Government's commitment to halt the overall decline in biodiversity, including by*

establishing coherent ecological networks that are more resilient to current and future pressures;”

- 7.236 London Plan Policy 7.19 (Biodiversity and access to nature) states that *“development proposals should wherever possible make a positive contribution to the protection, enhancement, creation and management of biodiversity”*.
- 7.237 Local Plan Policy GB7 (Biodiversity) seeks to protect and enhance the Borough’s natural environment and seeks to increase the quantity and quality of the Borough’s biodiversity.
- 7.238 An Ecology Assessment has been included within the ES and confirms that there will be a minor adverse impact on Lampton Park due to the minor loss of grassland and introduction of shrubs, potential disturbance of nesting birds during the construction phase and potential increased mortality to hedgehogs. A number of mitigation measures have been proposed to minimise the adverse impact on ecology across both Phases of the development, including provision of replacement grassland, creation of green and brown roofs, installation of bird (min. x19) and bat (min. x14) boxes and provision of log piles (min x 4) to provide habitats for invertebrates and small mammals. Such measures would be secured by condition as part of a Landscape and Ecology Management Plan. Additionally a Biodiversity Enhancement Strategy will be secured by condition to include measures to enhance the value of the existing habitats within Lampton Park through a more ecological sensitive management, new tree and shrub planting and provision of additional habitat features, with a post construction monitoring strategy to provide details of the change in biodiversity value of the Park upon implementation of the strategy.
- 7.239 An Arboricultural Report has been submitted with the application. This identified 179 trees and 11 groups across the site. Of these it categorised 97 as being within ‘C’ or ‘U’ category and consequently appropriate for removal. The report also sets out measures to ensure the protection of trees that are to be retained during the construction phase of the development. These details will be secured by condition.
- 7.240 The proposed masterplan seeks to incorporate as many of the existing trees as possible, providing a mature buffer that will be enhanced with new tree planting. The proposals include provision for more than 165 new trees across the site, replacing those removed on a more than like for like basis. New trees will be a mixture of semi-mature and mature stock to provide instant structure and maturity to the development.
- 7.241 There are a number of commemorative trees across the site, including one planted by Her Majesty the Queen. The masterplan specifically provides for their sympathetic relocation where practicably possible. Where this is not possible, a new tree of the same or similarly appropriate species will be planted. These details will be secured by condition as part of the landscape condition.
- 7.242 Whilst the proposal would result in the loss of some trees across the development site, it is considered the overall tree strategy is acceptable in principle and would ensure that a greater number of trees were re-provided. It is therefore considered that the proposal, subject to safeguarding conditions

and the implementation of the mitigation strategies described above would be in accordance with Local Plan Policy GB7 and the London Plan.

Socio-Economic considerations

7.243 The NPPF describes the purpose of the planning system to contribute to the achievement of sustainable development, which is defined as:

“Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

- *Making it easier for jobs to be created in cities, towns and villages;*
- *Moving from a net loss of bio-diversity to achieving net gains for nature;*
- *Replacing poor design with better design;*
- *Improving the conditions in which people live, work, travel and take leisure; and*
- *Widening the choice of high quality homes”*

7.244 London Plan Policy 3.3 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. It sets a minimum target of 8,222 dwellings for Hounslow over a 10-year period.

7.245 Policy 3.7 recognises that large residential developments (500+ dwellings) have a particular role in the provision of social, environmental and other infrastructure and to create neighbourhoods with a distinctive character, sense of local pride and civic identity.

7.246 Policy 3.8 urges local planning authorities to respond to regionally and locally identified requirements in order to ensure that 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, including the private rented sector, in meeting these.

7.247 Policy 4.1 states that the Mayor will work with partners to *“promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost”*.

7.248 In relation to housing supply Policy SC1 of the Local Plan commits the Council to a total of 12,330 dwellings in the plan period, that is 822 dwellings per annum from 2015-2030.

7.249 For community facilities generally Policy CI1 provides: *“We will protect existing community facilities in the borough that continue to serve the community and direct new community facilities to the most appropriate locations. We will achieve this by (c) Promoting new community facilities in areas of growth and where identified in the council’s Infrastructure Delivery Plan.”*

7.250 In relation to schools and educational facilities the Plan at Policy CI2 provides: *“We will plan for, invest in, and facilitate development of a network of education facilities which cater for the increased demand for places and the changing*

educational needs of the borough population.” The need for additional places in education will be identified from forecasts of pupil numbers.

- 7.251 In relation to health and healthy places Policy CI3 provides: *“We will facilitate development of a network of health facilities which cater for the increased population and the changing health needs of the borough, while making the borough an environment which encourages healthy living.”*
- 7.252 Whilst the Local Plan refers to a requirement on developments to provide additional facilities, especially if they are large (more than 500 dwellings) schemes, this obligation will generally be met by financial levies on the development of three types: Community Infrastructure Levy (CIL), S.106 contributions and S.278 contributions. Hounslow’s CIL Charging Schedule took effect from April 2015. CIL covers education, health, leisure and cultural facilities, blue and green infrastructure and public space.
- 7.253 The proposed development, based on a completed scheme of up to 940 homes indicates a population of some 2,044 people, which in a very large metropolitan context such as Hounslow, is unlikely to have a significant effect. However, the provision of a significant amount of new housing (approx. 7.5% of the total number of dwellings planned to be built in the 15 years covered by the Local Plan) would have a significant benefit to the housing choice in the area, with a range of sizes and tenures being offered as part of the development. Furthermore, the proposal would include a review mechanism on the affordable housing tenure split that may result in an uplift in delivery of affordable rented units over shared ownership units to bring the scheme more in line with current policy requirements.
- 7.254 Based on the GLA population yield calculator, Phase 1 of the development is expected to result in 55 additional children aged 0-9 and 20 additional children aged 10-18. However, this demand for school places has been incorporated into the projections for local schools and as such there would not be an issue of availability of school places following completion of Phase 1.
- 7.255 It has been estimated that Phase 2 of the development will result in 298 additional children aged 0-9 and 114 additional children aged 10-18 (from Phase 1 and 2 combined). Projections of school places highlight that there is likely to be a surplus of approx. 90 primary school places and a shortfall of 238 secondary school places upon completion of Phase 2 in 2022. The projections of places already take into account 600 of the 940 dwellings of the proposal. Whilst this highlights a shortfall in secondary school places come 2022, LBH is currently preparing its schools place strategy for the period 2020-2025 which will fully account for the additional places required as a result of the proposal alongside other future developments in the Borough. Alongside this strategy, it should be noted that the development will be CIL liable which could be used to deliver additional education facilities in the area should capacity be exceeded.
- 7.256 With regards to impact on health facilities, it is noted that the increase in population arising from the completion of both Phases would result in a slight increased demand for health services but the fact that local GP surgeries are still accepting patients would largely mitigate this increase.
- 7.257 The proposal would create three new publicly accessible open spaces (totalling

some 0.85ha), and whilst these spaces are likely to be used largely by future residents of the development, their provision would ensure that there would not be a significant increase in demand for open space provision as a result of this development. It is also noted that the development would provide play space in accordance with the London Plan requirements.

7.258 It is therefore considered that the proposed development would make a significant contribution to housing supply in the local area and help towards meeting the Borough's target for housing delivery. Whilst there would be increased pressure for school places in the long term, any short-term demand for additional places can be met within the existing provision and payments of CIL could help towards the delivery of expanded or new facilities in the future if required. Furthermore, it has also been satisfactorily demonstrated that the proposal would not have an unacceptable impact on existing health facilities, community facilities or open space provision. As such the proposal would be in accordance with the adopted Local Plan and London Plan.

Planning Obligations

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

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

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

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

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

- i) On-site provision of affordable housing (90 affordable rent tenure and 278 shared ownership tenure across both Phases with 18 affordable rent tenure and 53 shared ownership tenure delivered in Phase 1, with a review

mechanism to assess the potential uplift in affordable rent tenure against shared ownership tenure to be delivered in Phase 2 prior to the commencement of this phase)

- ii) Construction training contribution – to provide a scheme for Construction Training prior to commencement of development to the value set out in the adopted Planning Obligations & CIL SPG.
- iii) CPZ Consultation & Expansion contribution of £18,000
- iv) Exclusion of new residents applying for existing CPZ permit and new CPZ for the site
- v) Car club (2 spaces to be provided free of charge for the length of the development to be provided upon occupation of the first residential unit)
- vi) Travel Plan (Residential) to include £100 sustainability voucher provided for each dwelling upon first occupation
- vii) Considerate Contractors Scheme

8.0 EQUALITIES DUTIES IMPLICATIONS

8.1 The Council has to give due regard to its Equalities Duties and in particular with respect to its duties arising pursuant to the Equality Act 2010, section 149. It is considered that there will be no specific implications with regard to the Council's duty in respect of its equalities duties and that if approving or refusing this proposal the Council will be acting in compliance with its duties.

9.0 COMMUNITY INFRASTRUCTURE LEVY

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

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

Mayors £35 per m ²				
Hounslow:	Housing: East £200m ² Central £110m ² West £70m ²	Supermarkets, superstores and retail warehousing: £155 m ²	Health care, education and emergency services facilities: £0	All other uses: £20m ²

9.3 This proposal would be liable to pay Community Infrastructure Levy.

9.4 Total existing floorspace = 37,009sqm (to be demolished across the two phases)

9.5 Total new residential floorspace across both phases = 86,168sqm

9.6 Total new non-residential floorspace across both phases = 114sqm

9.7 Phase 1

Total floorspace – demolition = 17,501sqm.

17,501sqm – affordable housing (subject to exemption being applied) =
10,349sqm

Hounslow CIL = 10,349sqm * £110 = £1,138,390

Mayoral CIL = 10,349sqm * £35 = £362,215

9.8 Phase 2

Total floorspace – demolition = 57,275sqm

57,275sqm – affordable housing (subject to exemption being applied) =
23,688sqm

Hounslow CIL = 23,688sqm * £110 = £2,605,680

Mayoral CIL = 23,688sqm * £35 = £829,080

10.0 CONCLUSION

The proposal would result in the re-development of this prominent site, facilitated by the relocation of the Council's Civic Centre to a site within Hounslow Town Centre allowing the release of the application site for much needed housing, including a substantial proportion of affordable housing. Furthermore, it would provide a high standard of accommodation in a sustainable location with access to high-quality usable, private amenity space for future residents.

The scheme is considered to be of a high design quality, suited to the existing site and surroundings and which would help reinforce the connectivity of the site and wider area with Lampton Park. The inclusion of significant public realm provision across the site, incorporating the existing mature tree planting around the site's fringes, would serve to underpin this connectivity and help to reinforce a sense of local identity within the development. This would be further emphasised by the external design of the development through a number of distinctive typologies that would relate well to the surrounding area. Whilst there would be taller elements of the scheme that would be a significant departure from the height of the surrounding area, it is considered that these have been successfully achieved through a high quality architectural and urban design approach.

Whilst the proposed development would result in some harm to adjoining residential properties where there is an identified impact on some residents' amenity, it is not considered that this would result in a significant, unacceptable impact with the benefits of the scheme outweighing any harm. Furthermore, it is considered that there would not be a significant adverse impact arising from traffic associated with the development, with a reduction in vehicle movements from the existing use being shown, whilst the level of parking provision, both car and cycle, is considered to be appropriate for this location.

As such, it is considered that the scheme is an appropriate response for the planning framework for the area and it will bring substantial benefits to the environmental, social and economic well-being of the area, notably those

arising from the delivery a significant level of new housing, including a high proportion of affordable housing which would outweigh any harm and so overall the proposal would be in accordance with the objectives and policies of the NPPF, the London Plan and the adopted Local Plan.

11.0 RECOMMENDATION

That planning permission be **granted** subject to Stage 2 referral to the GLA, the following conditions and securing the abovementioned planning obligations by prior completion of a satisfactory legal agreement or unilateral undertaking under Section 106 of the Town and Country Planning Act 1990 and/or other legislation (including any agreements under Section 278 or Section 38 of the Highways Act 1980), the exact terms of which shall be negotiated by appropriate officers in the Department of Regeneration, Economic Development & Environment on the Head of Governance's advice.

The satisfactory legal agreement or unilateral undertaking outlined above shall be completed and planning permission issued by 1st April 2016 or such extended period as may be agreed in writing by appropriate officers within the Department of Regeneration, Economic Development & Environment or Head of Governance's Office.

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

Following the grant of planning permission, where (a) requested to enter into a deed of variation or legal agreement in connection with the planning permission hereby approved and by the person(s) bound by the legal agreement authorised in paragraph 1 above, and (b) where the planning obligations are not materially affected, and (c) there is no monetary cost to the Council, the Director Regeneration, Economic Development & Environment or Assistant Director – Community Safety, Environment and Regulatory Services or the Head of Development Management is hereby authorised (in consultation with the Chair and upon the advice of the Head of Governance) to enter into a legal agreement(s) (deed of variation) made under Sections 106 and/or 106A of the Town and Country Planning Act 1990 and or other appropriate legislation.

If planning permission is refused, the Director Regeneration, Economic Development & Environment or Assistant Director – Community Safety, Environment and Regulatory Services or the Head of Development Management (in consultation with the Chair) is hereby authorised to approve any further application for planning permission or listed building consent validated within 12 months of the date of refusal of either application, provided that it (a) duplicates the earlier application, and (b) that there has not been any material change in circumstances in the relevant planning considerations, and (c) that a satisfactory legal agreement or unilateral undertaking securing the obligations set out in the

report is completed within any specified period of time.

Drawing numbers:

TBC

Conditions:

General/Phasing

- ‘Grampian’ condition securing substantive form of the S106
- Time limit for implementation (within 3 years of this permission or within 2 years of last reserved matter)
- In accordance with approved plans
- Reserved Matters time limit (submitted within 3 years of this permission)
- Reserved Matters details (securing layout, scale, appearance and landscaping)
- Parameter Plans (Outline development and any Reserved Matters shall not exceed maximum parameters)
- All dwellings in Phase 2 shall be designed in accordance with the London Plan draft Housing SPG (2015), or such other adopted guidance in place at the time of submission of the Reserved Matters

Programmes

- Construction and Phasing Development Programme
- In accordance with submitted Construction Management/Logistics Plan

Residential Design

- Waste & recycling materials
- Materials (to include details of; all external facing materials, the external treatment of flank walls of maisonettes within podium of Block A, any privacy measures, e.g. obscure glazing, balconies and privacy screens)
- Housing Standards (all dwellings to M4(2) Building Regulations standard)
- Min. 18 ‘Wheelchair User Dwellings’ to Building Regulations M4(3) standard within Phase 1
- External lighting strategy
- Residential Design Codes
- Acoustic design strategy
- Water Consumption (so as not to exceed 105l/p/day)

Drainage

- Detailed Drainage design including maintenance strategy
- Thames Water: Water supply impact study
- Thames Water: Piling method statement

Ground works

- Archaeological works (watching brief)

- Phased contamination

Environmental

- Environmental Sustainability
- Phase 1 development in accordance with Energy Strategy
- Energy Strategy for Phase 2 development
- District heat network provision
- Sustainable Construction
- Tree Protection Plan
- Landscaping (to include; all soft and hard landscaping, boundary treatment including at podium level of Block A, play spaces/equipment, memorial tree replacement/replanting strategy, maintenance plan, landscape & ecology management plan)
- Landscaping Design Codes
- Biodiversity Enhancement Strategy
- Bird/Bat boxes & log piles (min. no. and locations)

Time Restrictions

- Demolitions or Construction Hours

Transport

- Construction Logistics Plan as submitted for Phase 1
- Submission of a Construction Logistics Plan for Phase 2
- Commercial Delivery & Servicing Plan (to include vehicle tracking)
- Car Park Management Plan (to include details of; accessible car parking, electric vehicle charging points & monitoring to ensure passive charging points are brought into use when required; measures to maximise use within undercroft car parks)
- Cycle parking (to include details of storage for Blocks A and B in Phase 1 and details for Phase 2)
- Highways works (to include relocation of bus stand (H20) and bus stop (120))
- Parking, loading, turning spaces
- Vehicular access points
- Provision of entry and exit signage as appropriate (i.e. one way signage at the central access road and also at the southern access road once the northern access is completed).
- Visibility splays provided as shown

Other

- BAA/Heathrow safeguarding condition: max. building height limit of 87m AOD
- BAA/Heathrow safeguarding condition: Light Spill
- BAA/Heathrow safeguarding condition: Bird hazard management plan
- Odour mitigation (for any subsequent A3 use)
- External Plant
- Restriction on permitted development – additional windows/boundary treatment/extensions
- Restriction on hours of use for A1/A3 use - 8:00am to 11:00pm Monday to Saturday, 10:00am to 11:00pm Sundays, Bank Holidays and Public Holidays
- Restriction on hours of delivery for A1/A3 use – not outside of the hours 7:00am to 6:00pm
- Restriction on external noise A3 use
- Thames Water: Petrol/oil interceptors fitted to all car parking facilities
- Thames Water: provision and maintenance of a fat trap to A3 use

Informatives:

For landscaping: Stands of trees with the potential to provide canopy's for bird species such as Rooks, Crows should be planted at 4 metre centres or greater. Tree species such as Oak (*Quercus* sp.), Scots Pine (*Pinus Sylvestris*), and Beech (*Fagus sylvatica*) should be excluded from the planting scheme. Large quantities of berry bearing species should be avoided. If they are essential to the integrity of the proposed planting scheme, low numbers of berry bearing plants may be dispersed amongst other non berry species to reduce the total food supply for birds. In this location, berry bearing species should be kept below 5% of the total planting palette.

Given the nature of the proposed development it is possible that a crane may be required during its construction. BAA/Heathrow Safeguarding would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at [http://www.aoa.org.uk/operation & safety/safeguarding.htm](http://www.aoa.org.uk/operation&safety/safeguarding.htm))

Wind Turbines can impact on the safe operation of aircraft through interference with aviation radar and/or due to their height. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 7, 'Wind Turbines and Aviation' (available at [http://www.aoa.org.uk/operation & safety/safeguarding.htm](http://www.aoa.org.uk/operation&safety/safeguarding.htm)).

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at <http://www.thameswater.co.uk/business/9993.htm> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.