

Planning Statement

In respect of

1a - 5 St John's Road, Isleworth,
TW7 6NN

On behalf of

Network Housing Group

RPS CgMs Ref: JM/AE/MM/20729

March 2016

Secure & Stable
ADDING VALUE

QUALITY MANAGEMENT

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EXECUTIVE SUMMARY

- 1.1 This statement has been prepared on behalf of Network Housing Group, in support of a planning application for the redevelopment of the site at 1a-5 St Johns Road for residential use.
- 1.2 The application seeks planning permission for the *“demolition of buildings and redevelopment of the land to provide a part three part five storey building of 34 residential units with associated car parking and cycle parking and landscaping.”*
- 1.3 The application proposals have been subject to pre-application meetings on 17th February and 7th March with Melek Ergen of Hounslow Council. The applicant has undertaken a community consultation exercise with members of the public and interested parties.
- 1.4 The supporting documentation required for the validation of the planning application is detailed below. This was agreed by the Planning Officer, Melek Ergen on 7th March 2016:
- i. Design and Access Statement prepared by Rock Townsend– March 2016
 - ii. Daylight and Sunlight Report prepared by RVM Partnership- March 2016
 - iii. Drainage Strategy Statement prepared by Tully De’Ath – March 2016
 - iv. Ecology Review prepared by Eight Associates – March 2016
 - v. Heritage Statement prepared by RPS CgMs – March 2016
 - vi. Marketing Evidence prepared by Colliers – March 2016
 - vii. Marketing Report prepared by Colliers – March 2016
 - viii. Phase 1 Desk Study Report prepared by Opus – March 2016
 - ix. Energy Assessment prepared by Eight Associates – March 2016
 - x. Sustainability Statement prepared by Eight Associates – March 2016
 - xi. Travel Plan prepared by TPA – March 2016
 - xii. Transport Statement prepared by TPA – March 2016
 - xiii. Acoustic Assessment prepared by Cole Jarman – March 2016
- 1.5 The report is structured as follows: Section 2.0 of this statement sets out the application site context and relevant planning history. The evolution of the development proposal is outlined in Section 3.0 followed by the proposed scheme in Section 4.0. Section 5.0 analyses the relevant planning policy context and Section 6.0 looks at planning considerations. Section 7.0 examines the planning obligations and finally Section 8.0 concludes and summarises the statement.

2 SITE AND SURROUNDINGS

Application Site

- 2.1 The site is located within Isleworth in the London Borough of Hounslow. The site currently comprises a small area of retail floorspace facing St Johns Road with residential uses above, a vacant warehouse to the rear which comprises industrial and ancillary office floorspace, and various industrial units to the rear. Please refer to the location plan detailing site boundary. The application site comprises 1794sqm.
- 2.2 The site benefits from a PTAL rating of 3 – Moderate, although with Isleworth Station a 3 minute walk from the site and bus routes travelling along London Road (a 1 minute walk away from the site) and St Johns Road, there are numerous modes of transport available. 60m along St Johns Road the PTAL increases to 4.

Surrounding Area

- 2.3 The surrounding area is primarily residential along St Johns Road with various commercial units facing it. As noted above the rear of the site comprises various warehouses that are within industrial use. Further South along St John's Road is a small neighbourhood retail area offering local amenities including a pub, coffee shops, and a small supermarket.

Heritage

- 2.4 No building on the site is listed and there are none in close proximity to the site. The site is adjacent the Spring Grove Conservation Area (Please refer to Heritage Statement for detailed analysis of the impact of the proposed development upon the Conservation Area).

Flooding

- 2.5 The site is within flood risk zone 1 and located within an area of low-medium risk of surface water flooding.

Planning History

- 2.6 The Council's online register has been consulted, and relevant planning history detailed below:
- LPA Reference Number: 00981/3-5/P11 approved the demolition of existing outbuildings and erection of warehouse and workshop with ancillary offices in connection with the storage and repair of bicycles and the manufacture of watch cleaning machinery on 6th April 1978.

- LPA Reference Number: P/2011/2989 refused planning permission for the change of use of the warehouse building to the rear from B8 (storage) to D2 (gymnasium) following installation of entrance doors and screen alterations to the mezzanine level. The reasons for refusal, as noted in the delegated report, are that the proposal fails to comply with requirements of policy EP8 (Other industrial land – outside strategic and LSIS) of the Council's Employment Development Plan Document, a sequential test approach was not demonstrated and the increased noise and disturbance and inadequate parking provision.
- LPA Reference Number: P/2013/0903 granted planning permission for the change of use of the premises from a B8 storage use to a B2 joinery workshop and installation of an extract duct to the roof. The use has already commenced, and this application is to remedy the breach of planning control (CUCO/2012/0071).

3 EVOLUTION OF THE DEVELOPMENT SCHEME

- 3.1 The scheme has evolved since the pre-application meetings on the 17th February 2016 with officers at Hounslow Council and further on the 7th March.
- 3.2 The original scheme presented at the first pre-application meeting to London Borough of Hounslow sought the demolition of the buildings on the site and the redevelopment of the land to provide 37 residential units.
- 3.3 The meeting with the planning officer at Hounslow Council on the 17th February 2016. A summary of the key outcomes of the pre-application meeting are detailed below:
- a. **Land Use** – There was no objection to the principle of the development.
 - b. **Heritage** – As the site is adjacent to the Spring Grove Conservation Area regard should be have regard to this and use high quality materials in the development. Brick with aluminium windows were suggested.
 - c. **Height, Layout, and Massing** – The planning officer expected the density to be in a range of 200-450hr/ha. They expected to see a greater emphasis on family sized accommodation to reflect the local area provision. A 40% affordable housing target was sought in line with policy. 10% of the accommodation should be wheelchair accessible; new development must comply with the internal space standards set out in the London Plan. The officer suggested communal amenity space on the deck above the car park but highlighted the need to respect neighbours' living conditions in its design.
 - d. **Residential Quality** – Comments were received regarding the quality of the accommodation in terms of amenity space and the single aspect units. Outlook and light quality were also of concern.
 - e. **Parking, Servicing, and Deliveries** – The planning officer suggested reducing the number of car parking spaces mindful of the PTAL level of the site. 10% of the spaces must be for electric vehicles and the cycle parking and refuse areas are too prominent. The officer was also concerned with the size of the turning circle for the refuse vehicles.
 - f. **Sustainability** – The application must include an energy statement demonstrating compliance with the Mayor's energy hierarchy.
- 3.4 The applicant subsequently took on board the advice given in the meeting / written response and responded accordingly through the revised scheme proposed. A further pre-application meeting was held on 7th March. The amendments to the scheme comprised the following:

- a. Increase in 3 bed units;
- b. All ground floor units comprise wheelchair accessible units with three of these possessing dedicated parking and amenity space;
- c. Removal of single aspect units;
- d. Increase in amenity space including amenity deck;
- e. Reduction in car parking spaces to improve the standard of accommodation.

3.5 The feedback of the second meeting with the planning and design officers at Hounslow Council on the 7th March is detailed below:

- The above changes were agreed as acceptable by the officer.
- Density – the LPA confirmed focus for determination of the scheme is placed upon quality of the units proposed. It was agreed that density figure was increased marginally above the PTAL range for this location mindful of the proportion of the three bedroom units
- LPA noted the following regarding design:
 - Cycle store needs to be accessed from street
 - Need more cycle spaces as all 2 bed units need 2 spaces each
 - Balconies need screening added – suggested obscured glazing or angled louvres
 - Parking stress survey would be needed including 200m of site and car ownership assessment to justify reduced car parking spaces
 - Amenity space provision as shown are acceptable
 - Space standards of specific units fine as long as they are compliant with London Plan
 - Red brick and deep reveals are preferred – the latter in order to introduce greater depth to the elevation
 - 1:50 detail of window bay is required in DAS// Drawing package

3.6 The design team reviewed the comments made and have amended the scheme as noted within this submission and described within Section 4.0 of this statement.

Public Consultation – Statement of Community Involvement

3.7 A public consultation event was held at St John the Baptist Church Hall on the afternoon into evening of 10th March 2016, with display boards showing the draft proposals and allowed for the opportunity for local residents / attendees to leave written and verbal feedback.

3.8 All Ward Councillors were invited to attend the event although only Ward Councillor Tony Louki attended.

3.9 The views of local neighbours varied and most comments were focused on level of car parking spaces and loss of retail units both of these issues are detailed and justified below in section 6.0.

4 PROPOSED DEVELOPMENT

4.1 The planning application submission seeks:

"demolition of the buildings at 1a to 5 St John's Road Isleworth and the redevelopment of the site to provide a part three part five storey residential building of 34 units."

4.2 The residential development will provide:

8no. 1 bedroom flats;
19no. 2 bedroom flats; and
7no. 3 bedroom flats.

4.3 The proposed scheme comprises a part three part five storey red and buff coloured brick building with an aluminium light grey rain screen cladding.

4.4 The scheme will provide 34 apartments of one, two and three beds accommodating between one and five people each. The ground floor will provide four wheelchair accessible units of 2 x 1 bed and 2 x 3 beds.

4.5 The scheme will provide a minimum 14 affordable units (40% of total units) which are all proposed as shared ownership.

4.6 The development will have 17 car parking spaces provided for the residents in including 4 wheelchair spaces. Additionally, there will be 34 secure cycle parking spaces with a further 10 on the front pavement.

4.7 The proposal also includes private amenity for all units apart from Unit 00.01 which has a larger internal footprint to make up for a lack of external space. There is also an amenity deck provided which covers 206sqm.

4.8 Access to the car park will be on Rennels Way, the road to the South of the site.

5 RELEVANT POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the development plan, unless material consideration indicates otherwise.
- 5.2 In this instance, the development plan consists of:
- a. The Further Alterations to the London Plan (2015); and
 - b. Hounslow Local Plan (2015).
- 5.3 In addition, the following documents are material considerations when reviewing the proposed scheme:
- The National Planning Policy Framework (2012) (NPPF);
 - The National Planning Policy Guidance (2014) (NPPG);
 - Planning Obligations SPD;
 - Air Quality SPD; and
 - London Housing SPG.
- 5.4 Policies from these documents including the Proposals Map have been reviewed for the purpose of this Planning Statement and in order to demonstrate that the proposal complies with relevant policies and is therefore considered acceptable.

Site Specific Policies

- 5.5 In accordance with the adopted Hounslow Local Plan proposals map the frontage of the site is located within the following designation:
- Large Neighbourhood Centre TC1
- 5.6 The proposals map indicates the site is adjacent to the Spring Grove Conservation Area
- 5.7 The following section addresses the planning policy context, principally the principle of redevelopment at the site, including the loss of the existing land uses together with the need for new housing and an assessment of proposals against relevant adopted planning policies.

Loss of Existing Land Uses

- 5.8 Policy TC1 – *Town and Neighbourhood Centre Network* states that LB Hounslow will maintain a network of successful town and neighbourhood centres, each with their own role and function, to provide the shops, services and facilities needed to meet the needs of the boroughs population.

- 5.9 Policy TC5 – *Managing neighbourhood centres and isolated local shops* notes that LB Hounslow will achieve this by protecting the retail and community functions of neighbourhood centres to meet key day-to-day needs of local residents and retaining the retail function of neighbourhood centres by ensuring at least 50% of units are in A1 retail use having regard to the vitality and vibrancy of the centre. It also notes that ensuring the 50% of units in retail use is demonstrating the contribution the proposed use will make in terms of its value to the local community, meeting wider local service or business needs and enhancing the neighbourhood centres vitality.
- 5.10 Policy TC5 also states that development proposal must demonstrate the availability of alternative shopping provision in a town or neighbourhood centre within 400m/5 minutes walking distance where change of use from A1 retail is proposed.
- 5.11 The supporting text of Policy TC5 states that large neighbourhood centres are formed by strong cluster of shops and may surround a focal point.
- 5.12 Policy ED2 – *Maintaining the borough's employment land supply* states that LB Hounslow will expect development proposal to submit the following information where a loss of B8 or similar uses is proposed outside of SILs and LSISs:
- I. Evidence of active marketing of the site for employment uses for a period of at least two years in Key Existing Office Locations or *for a period of at least one year in other locations*;
 - II. An assessment demonstrating that the introduction of non-employment uses is necessary to achieve sufficient viability to deliver a development scheme. Preference will be given to the provision of new employment uses, followed by a mix of employment and non-employment uses. Proposals for non-employment uses will only be considered once the retention of employment uses has been shown to be unviable; and
 - III. Evidence that surrounding employment uses/ sites will not be undermined.

Assessment of Loss of Existing Land Uses

- 5.13 Currently the land is used as a cycle shop (Use Class A1 Retail) with residential uses on the upper floors and a vacant warehouse (Use Class B8) to the rear comprising industrial and a small amount of ancillary office floorspace. The majority of the site is not designated for a specific use within the proposals map. However, the commercial unit facing onto St John's Road is allocated as within the Large Neighbourhood Centre.
- 5.14 Policies TC1 and TC5 seek to resist loss of retail which meets local day to day needs. The use of the unit as a cycle shop is not considered to meet day to day need and therefore TC1 and TC5 do not apply in this context.

- 5.15 Additionally, the following material considerations are relevant in the determination of the application:
- the cycle shop is occupied by the freeholder who is offering the unit for disposal
 - the occupier is seeking capital receipt to invest in the cycle shop business in alternative, more suitable premises.
 - the cycle shop is not a convenience store for residents' day to day needs (as noted above that is what a neighbourhood centre should provide), it provides a specialist service which is visited by individuals yearly or bi-yearly rather than daily;
 - location of the current cycle shop is isolated from the rest of the Neighbourhood centre
 - redevelopment of the site to provide residential accommodation allows for all 4 wheelchair compatible units to be located on the Ground Floor, thereby significantly increasing accessibility to these units.
- 5.16 Further, extensive provision for meeting day to day convenience retail need is already made within the two local centres on St Johns Road and London Road. These includes a variety of services, inter alia, convenience stores, hairdressers, estate agents, cafes i.e. those typical of serving a local catchment. Sainsbury's have also recently signed a lease for occupation of 489 London Road therefore significantly increasing convenience retail offer in proximity to the application site. There is therefore no requirement to provide for additional convenience floorspace at the application site mindful of existing and projected local provision.
- 5.17 UDP Policy EP8– Other industrial Land (Outside Strategic and LSISs), is no longer relevant as it was not saved upon adoption of the Local Plan, however the target for this policy confirmed at least 95% of land lost from industrial / warehousing uses should be on industrial sites outside SILs and LSISs (2013.2014 AMR). Furthermore, the site is not allocated within the recently adopted Local Plan or policy proposals map for an employment land designation. Policy ED2 as noted above protects employment uses in SILs, LSISs and Key Existing office Locations, therefore not protecting 'other employment sites'.
- 5.18 The application is supported by a note prepared by Colliers that sets out the marketing of the premises that was undertaken prior to the opportunity for Network HG to deliver for affordable housing. The note demonstrates that there was limited (if any) interest for the premises to retained as the current mix of uses given the interlinked different operations. The note demonstrates that interest further diminished once site visits were organised and by the time of tender only 2 parties submitted offers.

- 5.19 Colliers note also provides commentary on the attractiveness of the site for a continued B Class use, concluding that its location is unattractive considered against the better located and better quality stock within the borough, which has good transport links to the wider country or further afield. Accordingly, rental levels that could be achieved would not be high.
- 5.20 In addition, it is noted that the site is surrounded by residential properties that would impact on the ability for another occupier to trade as they wish. It is understood that complaints regarding noise etc. have been received from local residents regarding the historic operation of the industrial premises which supports Colliers assessment.
- 5.21 Further to this, an Employment Land review is currently taking place which will demonstrate the current position in the borough.

Principle of Residential Development

- 5.22 The National Planning Policy Framework (NPPF) was published on 27th March 2012 and is the document which sets out the Government's planning policies for England and how these are expected to be applied. It has been created to provide a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities.
- 5.23 When determining planning applications, the Framework directs LPAs to apply a presumption in favour of sustainable development; the 'golden thread' which is expected to run through plan-making and decision-taking. Policy 14 of the Framework notes that the presumption in favour of development for decision taking means "approving development proposals that accord with the development plan without delay". This is re-iterated within policy 196 of the Framework.
- 5.24 Policy 17 of the Framework sets out 'core planning principles', including that planning should "encourage the effective use of land by reusing land that has been developed previously, provided that it is not of high environmental value". These principles also include to "proactively drive and support sustainable economic development to deliver homes ..."
- 5.25 Section 6 of the Framework specifically addresses delivery of a wide choice of high quality homes and Policy 49 notes that "housing applications should be considered in the context of the presumption in favour of sustainable development". Policy 50 goes on to also encourage the delivery of a wide choice of quality homes, as well as widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 5.26 In addition to the Framework, the government emphasised the need to secure an increase in house building in their Housing Strategy for England, November 2011. More recently, the need to promote construction as part of the economic recovery has been the subject of policy statements, leading to the Growth and Infrastructure Act 2013.

- 5.27 The NPPF notes that where local planning authorities have identified that affordable housing is needed, they should set policies for meeting this need on site, unless off-site provision of financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributed to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time (NPPF Policy 50).
- 5.28 The London Plan is the Mayor's Planning Strategy for London. The purpose of the London Plan is to promote economic and social development and environmental improvement for Greater London. It is intended to provide an overall strategy for development in London and ensure that a consistent approach is taken by each of the London Boroughs. The latest version was adopted in March 2015 and is titled 'Further Alterations to the London Plan' (FALP).
- 5.29 An overriding theme within the Further Alterations to the London Plan (2015) is to accommodate growth in a sustainable way. Paragraph 3.13 notes that London desperately needs more homes in order to promote opportunity and real choice for all Londoners, with a range of tenures that meets their diverse and changing needs and at prices they can afford.
- 5.30 FALP Policy 3.3: Increasing Housing Supply notes that the *'Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide real choice for all Londoners in ways that meet their needs at a price they can afford.'*
- 5.31 Policy 3.3 and Table 3.1 of the FALP sets a minimum housing target (expressed as dwellings per annum). Borough targets are provided within Table 3.1 and this provides an annual monitoring target of 8,222 units (2015-2021) for the London Borough of Hounslow. Paragraph 3.19 notes that these are minimum targets, to be exceeded by optimising development in individual sites and other sources of housing capacity. Finally, Part E of Policy 3.3 refers to Boroughs identifying and seeking to enable development capacity, in particular Brownfield capacity, especially of surplus commercial capacity and surplus public land.
- 5.32 The quality of new housing provision is addressed within Policy 3.5 of the London Plan which seeks to ensure that residential development should take into account the physical and local context; density; tenure mix; and provision of amenity space. These issues are considered later within this Section of the Planning Statement.
- 5.33 Local Policy SC1 – *Housing Growth* notes that over the three phases 2015-2030 there are 13,040 residential units allocated to specific sites and also 'Broad Locations'.
- 5.34 The supporting policy text also states that the projected increase in population growth within Isleworth from 2011 – 2030 is 21.1% from 25,634 to 31,054 people.

Assessment of Residential Development

- 5.35 Mindful of the above, it is clear that the redevelopment of the site for residential purpose is supported by both policy and also the LPA (please see written pre-application response dated 17th February). In accordance with the NPPF and local policy it is considered that this is a highly sustainable site which is wholly appropriate for residential use, mindful of identified housing need and potential population growth of Isleworth and across the Borough.
- 5.36 Development Plan policy and key material considerations further evolve this analysis by requiring regard to:
- a. Identifying a presumption in favour of sustainable development; and
 - b. Maximising the delivery of new homes to meet identified need;
 - c. Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
 - d. Maximising the delivery of new homes to meet identified need.

Affordable Housing / Housing Tenure

- 5.37 Annex 2 of the NPPF confirms three elements of tenure which comprise affordable housing, namely (a) social rented housing, (b) affordable rent, (c) intermediate rent.
- 5.38 Policy 173 confirms that the delivery of sustainable development requires 'careful attention to viability and costs' in decision-taking. It further emphasises the importance of development delivery:
- 'To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'*
- 5.39 The Further Alterations to the London Plan (2015) Policy 3.11 notes that boroughs should seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of the Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing.
- 5.40 Policy SC2 – *Maximising the provision of affordable housing* states the Council will maximise the provision of affordable mixed tenure housing on all sites and we will seek an overall quantum of 40% of additional housing from all sources to be affordable for homes delivered across the borough between 2015 and 2030. A viability assessment and any supporting evidence should be submitted

to demonstrate the maximum provision of onsite affordable housing is being proposed with reference to the 40% affordable housing target.

- 5.41 Moreover this policy states that LB Hounslow will expect development proposals to deliver (within the 40% of total unit numbers) a mix of 60% affordable/social rented and 40% intermediate tenures on all qualifying sites.
- 5.42 The Planning Obligations SPD 2008 states that the council will seek to secure 40% affordable housing on sites.

Assessment of Affordable Housing / Housing Tenure

- 5.43 For this particular scheme, the Section 106 Agreement will commit to 40% affordable housing units.
- 5.44 This can be broken down into the following:

- 14 x Shared Ownership Units

- 5.45 The delivery of a significant proportion of the units as affordable housing represents a key planning benefit to the Borough as in the reporting year 2012/13, only 304 net residential completions occurred, this is 166 units below the target and with the introduction of the FALP this target has increased to 822 in this regard. Within the reporting year for 2013/14 there were 835 net completions however only 79 of this 835 were affordable therefore there is an undersupply of affordable residential unit completions.
- 5.46 Furthermore, the proposed development is delivered on behalf of Network Housing Group who are a registered social housing provider who will seek to maximise the viable level of affordable housing delivery at the application site, including a policy compliant scheme in terms of level of affordable provided. This represents a significant benefit of delivery of the proposed development which must carry material weight in determination of the application.
- 5.47 The planning application is supported by a Financial Viability Assessment to demonstrate the proposed unit mix is that which represents the maximum viable use, and therefore in accordance with FALP Policy 3.11 and Local Plan Policy SC2
- 5.48 It is demonstrated above that the proposal is concurrent with national, regional and local policy in this regard, and will assist in meeting LB Hounslow's objectives for housing and affordable housing delivery.

Design

- 5.49 The NPPF advocates good design and high quality, inclusive development for all (paragraph 57) Section 7. 'Requiring Good Design' reinforces the importance of good design in achieving

sustainable development, by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in paragraph 58 the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to the local character and history, reflecting the built identity of the surrounding area. Paragraph 17 of the NPPF also notes that the planning should 'always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.'

5.50 Paragraph 60 of the NPPF confirms that Local Planning Authorities should not 'attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality, or initiative through unsubstantiated requirements to conform to certain development forms or styles.'

5.51 Architecture is addressed within London Plan Policy 7.6 which comments that buildings should, inter alia:

- Be of the highest architectural quality;
- Be of a proportion, composition, scale, and orientation that enhances, activates, and appropriately defines the public realm;
- Not cause unacceptable harm to the amenity of surrounding land and buildings;
- Incorporate best practice in resource management and climate change;
- Provide high quality indoor and outdoor spaces;
- Be adaptable to different activities and land uses, particularly at ground level;
- Meet the principles of inclusive design; and
- Optimise the potential of sites.

5.52 London Plan Policy 7.4 addresses local character and comments that new buildings should provide a high quality design response that has regard to the pattern and grain of existing spaces together with providing a human scale. Policy 7.2 of the London Plan addresses inclusive design and notes that the needs of disabled people should be integrated within the development proposals.

5.53 Local Policy CC1 – *Context and Character* focuses on context and character and states development proposals should have due regard to the Context and Character Study and demonstrate how their proposal:

- Responds to the design recommendations for each character area and urban type within which their development proposal is located.
- Responds to the wider context and history of the area, its communities, its natural landscape and its urban structure, form and function.

- Preserves and enhances particular features or qualities that contribute to an areas character e.g. mature trees.
- Provides opportunities to help form a new character or improve the poor aspects of an existing character that could benefit from enhancement.
- Responds to any local architectural vernacular that contributes to an areas character, for example bay windows, brickwork or a particular detailing.

5.54 Local Policy CC2 – *Urban Design and Architecture* states that development proposals will need to:

- Understand, integrate and where possible add to the natural landscape; including the topography, geology, existing features, landscape context, local flora and fauna and wider ecological setting of an area. Schemes should ensure that trees are suitably sited, protected during detailed design and construction, and provide amenity for the long term through effective maintenance arrangements;
- Deliver the right land use mix, amount and density in the right places to support the rejuvenation of our town centres and the creation of healthy, diverse and varied places;
- Create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate and feel safe during the day and night, with a particular focus on pedestrians and cyclists;
- Function well in themselves and in their effect on surrounding areas, have a positive impact on the amenity of current and future residents, visitors and passers-by and help create Lifetime Neighbourhoods that foster social interaction and capital;
- Respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings. The orientation of buildings and uses on sites to make best use of opportunities for passive design and access to daylight/sunlight should be considered;
- Provide a clear distinction between private, semi-private and public space, through an understanding of fronts and backs of buildings, ground floor uses, and continuity of street frontages and enclosure of space to help foster comfortable, usable and safe places;
- Provide a high quality, comfortable, safe and attractive public realm, well-integrated into its surroundings through using clear, well-defined boundary and building lines to address and animate the public realm;
- Ensure buildings and spaces are designed to stand the test of time and are easily adaptable and resilient to social, economic and technological change, and can accommodate movement and car parking in a safe and useable way;
- Promote and support contemporary architecture that responds intelligently to current and future lifestyles, needs and technology, whilst ensuring it's rooted in local context, at all scales;

- Promote low carbon design and incorporate energy efficiency measures that are themselves well integrated into the design and appearance of the development;
- Carefully consider external appearance, its composition and arrangement, through the use of high quality, durable materials and finishes and careful, considered detailing for building facades which add visual interest and richness to the street scene. A clear indication of how buildings are used and occupied should be presented, seizing opportunities for passive design wherever possible;
- Be designed to mitigate noise and air quality issues which significantly affect parts of the borough;
- Be designed so it is fully accessible to people with disabilities or impaired mobility;
- Provide adequate outlook, minimise overbearingness and overshadowing, and ensure sufficient sunlight and daylight to proposed and adjoining/adjacent dwellings; reduce reliance on single aspect dwellings, particularly if north facing, within noise bands C and D (as defined in the Noise Supplementary Planning Document) or containing 3 bedrooms or more; provide adequate levels of privacy and minimise direct overlooking through the careful layout, design and orientation of buildings and spaces; and
- Make well-designed provision for bicycles, and the acceptable storage of refuse, materials for recycling and composting and for convenient access for its deposit and collection in consultation with the council's waste services. Enclosures should be robust, well ventilated and attractively integrated with the building and screened for privacy and security.

5.55 In terms of Heritage policy, LB Hounslow will expect development proposals to:

- i. Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance;
- ii. Retain, conserve and reuse a heritage asset in a manner appropriate to its value and significance;
- iii. Demonstrate that substantial harm to or loss of a heritage asset is avoided, unless exceptional circumstances can be demonstrated, consistent with the NPPF;
- iv. Demonstrate that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be outweighed by the public benefits of the proposal, including securing its optimum viable use; or
- v. Have regard to any harm to, or loss of, the significance of a non-designated heritage asset, including from both direct and indirect effects. Non-designated heritage assets include locally listed buildings, Archaeological Priority Areas and areas of special local character.

Assessment of Design

5.56 Following the initial pre-application meeting alterations were made to the proposed scheme. The proposed and submitted scheme follows the principles of the pre-application recommendations in

terms of massing and bulk. The original 37 unit scheme has reduced to 34 units. Furthermore, the distribution, size, and configuration of the units within the building were altered.

- 5.57 After the initial pre-application meeting, changes to the internal layout of the original scheme were altered to include more wheelchair units, increased three bed units, altering of the location of refuse and recycling store and cycle store.
- 5.58 The proposed five storey building (including set-back top floor) respects the height and bulk of the surrounding properties. The site's location adjacent to the railway line, in a dip in the road and next to a property that has planning permission to be increased in height, provides an opportunity to increase the provision of housing whilst sitting comfortably in the street scene.
- 5.59 The proposals have and designed to step up from the lower properties to the immediate north, albeit the general built form increased in height again leading up to London Road. Given the topography of the land in the site's environs, the height of the building will be akin to that of the buildings on the junction of St Johns Road and London Road.
- 5.60 The development will provide good quality accommodation, with the majority of the units being dual aspect and private amenity space provided, albeit communal amenity space is designed to the rear to enhance the overall provision to occupiers. All of the flats will have a good level of daylight / sunlight.
- 5.61 The proposal includes enhancements to the St Johns Road frontage to increase the quality of the recently introduced hard / soft landscaping to further add to the wider streetscene.
- 5.62 Further assessment demonstrating the proposed development compliance with Local Plan policy CC1, CC2 AND CC4 can be found within the Heritage Statement and the submitted Design and Access Statement as prepared by Rock Townsend Architects.

Density

- 5.63 London Plan (2015) table 3.2 sets out the sustainable residential density guidelines by area characteristics. An 'urban' area which is defined in the London Plan as areas with predominantly dense development such as terraces houses, a mix of different uses, medium building footprints and within 800m walking distance of a District centre – all of these characteristics reflect the St John's site. Therefore, with a PTAL rating of 3, the matrix states between 200-450 habitable rooms per hectare is generally acceptable as a guide for development proposals. The scheme possesses a residential density of 562hr/ha, thus positively adhering to prescribed policy regarding density for the site characteristics within the London Plan.
- 5.64 It is however necessary to review further the relationship between the proposals and the site context, mindful of the requirement to optimise housing output.

5.65 Paragraph 1.3.51 of the March 2016 London Housing SPG states that in appropriate circumstances, it may be acceptable for a particular scheme to exceed the ranges in the density matrix, providing important qualitative concerns are suitably addressed. However, to be supported, schemes which exceed the ranges in the matrix must be of a high design quality and should be tested against the following considerations:

- a. the factors outlined in Policy 3.4, including local context and character, public transport capacity and the design principles set out in Chapter 7 of the London Plan; ***The proposed development responds positively to local context, acting as a conduit between the hotel/ town centre uses and the domestic scale residential development. Further, the submitted transport assessment demonstrates the local highway capacity can accommodate the vehicular and pedestrian impact of the proposal.***
- b. the location of a site in relation to existing and planned public transport connectivity (PTAL), social infrastructure provision and other local amenities and services; ***although the site is within PTAL 3, Isleworth Station is in very close proximity to the site offering high quality rail links to London and Kingston;***
- c. the need for development to achieve high quality design in terms of liveability, public realm, residential and environmental quality, and, in particular, accord with the housing quality standards set out in Part 2 of this SPG; ***the proposed scheme is of a high quality design and proposes a high standard of amenity to prospective occupiers – this is noted above.***
- d. a scheme's overall contribution to local 'place making', including where appropriate the need for 'place shielding'; ***the proposal delivers a material improvement to the character of the area and does not cause harm to the Spring Grove Conservation Area setting nor does it impact on local residential amenity;***
- e. depending on their particular characteristics, the potential for large sites to define their own setting and accommodate higher densities; ***n/a***
- f. the residential mix and dwelling types proposed in a scheme, taking into account factors such as children's play space provision, school capacity and location; ***the scheme includes a policy compliance mix including 7 x 3 bed units and a children's playspace of 24sqm within the landscaped amenity deck;***
- g. the need for the appropriate management and design of refuse/food waste/ recycling and cycle parking facilities; ***a servicing strategy has been put in place in the transport***

assessment, this also includes details on the number of cycle parking which is policy compliant; and

- h. whether proposals are in the types of accessible locations the London Plan considers appropriate for higher density development (eg. town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites) ***the proposed scheme includes the redevelopment of a previously used, industrial, although not allocated site and is therefore included within the list above. Additionally, the site is located in close proximity to Isleworth station.***

5.66 Policy SC4 states the Council will ensure the scale and density of new housing development balances the need to make efficient use of land and achieves high quality design and accessibility, whilst respecting and responding to local context and character and protecting existing residents' amenity. Development proposals should Meet the design standards set out in the Local Plan and elaborated upon within detailed supplementary guidance documents, including but not limited to, demonstrating compliance with prevailing daylighting standards (BRE Guidance 2011) and habitable room window separation guidance; and respond to the Context and Character Study, Conservation Area Appraisals, planning briefs, Neighbourhood Plan and other guidance prepared.

Further assessment of density

5.67 Following pre-application meetings, the application site (with a PTAL of 3) was calculated to have an area of 1794sqm (0.1794ha) and having 101 habitable rooms. As noted above, the density is 562hr/ha. The London Plan requirements for urban settings with a PTAL level of 2-3 are 200-450hr/ha therefore the proposal is above this threshold although it can be confirmed that:

- The proposal is of a high quality in terms of internal and external space, this includes the landscaped amenity deck provided;
- All units meet or exceed all unit sizes as noted within the London Plan;
- Defensible space is proposed for all groundfloor flats at front of the site;
- All units meet and exceed minimum floor to ceiling standards;
- The proposal does not impact on neighbours' amenity.

5.68 Additionally, it is noted within the latest London Housing SPG states that in appropriate circumstances, it may be acceptable for a particular scheme to exceed the ranges in the density matrix, providing important qualitative concerns are suitably addressed. Each point is addressed, in turn, above at point 5.65.

Quality of residential – Mix of housing types, sizes and external amenity

5.69 London Plan Policy 3.8 states that new developments should offer a range of housing choices in terms of mix.

5.70 Policy SC3 – *Meeting the need for a mix of housing size and type* states that LB Hounslow will expect development proposals to provide a mix of new housing as summarised in figure SC3.1 unless otherwise agreed with the council and that it should include a schedule of housing accommodation size and tenure and provide a unit of family accommodation at ground floor.

5.71 Policy SC5 – *Ensuring suitable internal and external space* states that LB Hounslow will expect development proposals to

- Demonstrate compliance with the Nationally Described Space Standard with a flexible approach taken to residential conversions to achieve heritage conservation objectives;
- Demonstrate through a clear design rationale how the benchmark external space standards contained in Figure SC5.2 have been considered. The exact area and character of external amenity space will vary according to the size and use of the dwelling unit;
- Show how the aspect, usability, sense of enclosure and prevailing pattern established by local character have been considered in external open space proposals to create sufficiently high quality living conditions. The arrangement of external amenity space across a site should also be carefully considered to ensure an appropriate balance of public, communal and private space. In family sized units, there should be direct and easy access to a good sized private garden;
- Be in accordance with the London Plan where flatted developments are proposed. This requires the provision of a minimum 5sqm of private outdoor space for all 1 to 2 person dwellings, with an additional 1sqm for each additional occupant. Balconies should be designed as an integral part of the building's elevation to maximise a beneficial aspect, and avoid positions that result in unacceptable overlooking and loss of privacy to other units or existing nearby dwellings; and
- Contribute to the achievement of other objectives in the Local Plan where development proposals compromise the delivery of elements of this policy.

Assessment of Quality of residential – Mix of housing types, sizes and external amenity space

5.72 The table below shows the proposed housing mix. This comprises 21% of the total number of units as 3-bed family accommodation. In addition, a proportion of the 2-bed units accommodate 4 persons which represent a locally significant delivery of family accommodation to meet identified local need.

Unit Type	Minimum Flat Size	Amount	Percentage (%)
1-bed	50sq.m	8	24

2 bed	66sq.m	19	55
3-bed	89sq.m	7	21

- 5.73 The three of the four proposed ground floor flats will have private gardens (unit 00.01 has 10sqm extra internal floorspace as a private garden to the front of the site was not deemed appropriate):
- Unit 00.02 – 55sq.m
 - Unit 00.03 – 60sq.m
 - Unit 00.04 – 70sq.m
- 5.74 The remaining flats have between 5sq.m and 18sq.m of private amenity space therefore in line with policy SC5 – specific details can be found within the Design and Access Statement submitted with this application.
- 5.75 The application also includes 208sq.m of communal floorspace with is provided in the form of an amenity deck on the first floor partly covering the car parking spaces. This includes an area of 24sqm which is reserved for a children’s play area, in accordance with GLA child yield play space requirements.

Sustainability and Energy

- 5.76 Policy 5.1 of The London Plan (2015) seeks to achieve an overall reduction in London’s carbon dioxide emissions of 60 per cent by 2025. For ‘major’ developments, policy 5.2A/B of The London Plan (2015) sets out the ‘lean, clean, green’ approach to sustainability, which is expanded in London Plan policies 5.3A, 5.7B, 5.9B/C, 5.10C and 5.11A. Overall, The London Plan requires a 35% reduction in carbon dioxide emissions over Building Regulations 2013 Target Emissions Rate (TER).
- 5.77 Policy EQ1 – *Energy and Carbon reduction* states that development must minimize the demand for energy and promote renewable and low carbon technologies. To do this all developments must meet the carbon emission reduction requirements set out in the London plan. All major developments must:
- Connect to, or extend, existing decentralised heating, cooling or power networks in the vicinity of the site, unless a feasibility or viability assessment demonstrates that connection is not reasonably possible. Where networks do not currently exist, developments should make provision to connect to any potential future decentralised energy network in the vicinity of the site, having regard to opportunities identified through the London Heat Map and area specific energy plans;

- Evaluate the feasibility and viability of Combined Heat and Power (CHP) systems and, where appropriate, examine the feasibility of extending the system beyond the site boundary, where developments cannot immediately connect to an existing heating or cooling network; and
- Where appropriate make a financial contribution to an agreed borough-wide programme for carbon reductions where required reductions cannot be achieved on- site.

5.78 Policy EQ2 – *Sustainable Design and Construction* notes developments must adopt sustainable design and construction, consistent with the principles established in the London plan. To do this developments must:

- Incorporate established principles for sustainable design and construction as set out in the London Plan, including passive solar design, water efficiency standards, sustainable drainage, the reuse and recycling of construction materials, green roofs and urban greening;
- Be assessed against the standards for sustainable design and construction set out in Table EQ2.1 [Local Plan 2015] and submit relevant documentation to demonstrate that minimum specified levels are met or meet any national standards that subsequently supersede these; and
- Prepare a sustainability statement, where major developments are proposed.

Assessment of Sustainability and Energy

5.79 The energy statement confirms that 220sqm of PVs will be provided which will contribute to a carbon reduction of 38.45%. Therefore in line with London Plan Policy and Local Policy. The submitted Sustainability Statement has responded to the London Borough of Hounslow planning policy requirements. In summary the scheme will:

- Reduce energy consumption by targeting improved U-values, airtightness, and low energy lighting, and by installing a high efficiency communal boiler;
- Be located in a low flood risk zone;
- Be of high build quality, will surpass the minimum Building Regulations for water using fittings and source materials ethically and sustainability;
- Aim to source local labour throughout the construction phase;
- Ensure all materials are responsibly sourced and of low environmental impact;
- Implement a site waste management plan;
- Create a scheme that is efficient and adaptable to future climatic scenarios by installing water efficient sanitary fittings;
- Ensure that there is no net loss of biodiversity as a result of the scheme; and

- Follow best practice policies in terms of air, water and ground pollution and appoint a contractor who will register for the Considerate Constructors Scheme.

Land Contamination

- 5.80 The London Plan Policy 5.21 Contaminated Land proposes that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
- 5.81 As part of the NPPF's policy strategy, there is an emphasis on the duty of the planning system to contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated, and unstable land, where appropriate.
- 5.82 Local plan Policy EQ8 – *Contamination* states that new developments will be expected to present adequate site investigation information, including an assessment of the site's history, potential contamination sources, pathways and receptors.

Assessment of Land Contamination

- 5.83 Based on the history of the site it is considered that the proposed development of the site generally poses a low to medium potential risk to humans and a low to medium risk to local controlled waters, therefore in line with the above policies. The main potential sources of contamination are considered to include the following:
- Historic made ground imported on to site;
 - Motor repair service centre on site with the storage of waste oils;
 - Localised oil leaks from parked vehicles;
 - Offsite sources include large historic laundry and filling station with MOT centre;
 - Potential ground gas from historic landfill to the west of the site and made ground beneath the site.
- 5.84 Based on the redevelopment of the site being for residential use with areas of soft landscaping/gardens, the main receptors considered to be most at risk in the long-term are site residents who will be at a higher risk of coming into direct contact with the site's surface and thus potentially contaminated soil within areas of soft landscaping.
- 5.85 The report recommended that a ground investigation is undertaken to expose the existing soils on site and establish gas and groundwater monitoring installations. The ground investigation will allow for the physical examination of the soils on site and allow soil/groundwater samples to be retrieved and sent for laboratory analysis to inform a soil and groundwater assessment. This can be confirmed at application stage.

Transport, parking, servicing, and cycle parking

- 5.86 Policy 30 of the NPPF states encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion ... local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
- 5.87 London Plan Policy 6.13 requires the standard in table 6.2 to be applied for car parking and the standards in table 6.3 to be applied for cycle parking. Table 6.2 states that less than 1 car parking space should be provided per unit for 1 and 2-bed flats and up to 1.5 car parking spaces should be provided per unit for 3-bed flats. Table 6.3 states that residential developments should provide 1 cycle space for studio and 1-bed room units and 2 spaces per all other dwellings. There should also be 1 space per 40 units on a short stay basis.
- 5.88 Local Plan Policy EC2 – *Developing a sustainable local transport network* states that LB Hounslow will promote 'car free' or 'low car' development where appropriate, as well as car clubs and car sharing schemes. Additionally, it notes that LB Hounslow will expect development proposals to demonstrate they are located appropriately with regard to public transport accessibility and capacity, road network capacity and access to good quality walking and cycling networks. Developments should provide a minimum number of cycle parking spaces and an appropriate maximum number of car parking spaces consistent with London Plan policy.

Assessment of parking, servicing, and cycle parking

- 5.89 The proposed development will provide 17 car parking spaces, an area for motorcycle parking, and up to 34 cycle parking spaces. The Transport Statement provided by TPA concluded that the proposed development is located in a sustainable location and will not have a detrimental impact on the local highway or public transport services.
- 5.90 Pedestrian access to the site will be taken via St John's Road. The existing bollards lining the site frontage and precluding direct vehicle access to the site via the front will be maintained. This will provide a large pedestrian area at the forecourt.
- 5.91 Additionally it can be noted that a total of six bus routes serve the immediate vicinity of the site with an average of three – four buses every hour. The nearest railway station to the site is the Isleworth Station, which is located approximately 200m to the north-east and served by the Southwest Trains. Hounslow East Station is located to the west within approximately 1.6km, it forms part of the London Underground.

- 5.92 The existing vehicular access via Rennels Way (off St John's Road) to the rear of the site will be maintained to provide access to the car park situated at the west (rear) of the site. The site is accessible through walking and cycling to a range of local facilities as well as the wider area via an extensive public transport network.
- 5.93 The site complies with national, regional and local planning policies with regards to its location and proposed parking provision for both cars and bicycles.
- 5.94 To conclude, given the location of the site and the 2011 census data analysis, the proposed parking provision is considered to be consistent with planning policies at national, regional and local levels.
- 5.95 The proposed development will generate no significant vehicle movements and, the related impact on the local highway network is considered minimal.

Waste and storage

- 5.96 Waste facilities will be provided on site via a secure bin store located at the rear of the site in the southern corner. Its entrance will be within the car park, thus be easily accessible.

6 DRAFT HEADS OF TERM / PLANNING OBLIGATIONS

- 6.1 The below obligations will secure the necessary infrastructure improvements to meet the needs of prospective residents and will benefit the existing local community through a S106.
- 6.2 Network Housing Group proposes to make contributions in respect of a number of Heads of Terms. This is based on the Planning Obligations SPD March 2008 and the relevant regulations from the Community Infrastructure Levy Regulations 2010. This is broken down as follows:
- Affordable Housing - Provision within development;
 - Education;
 - Health facilities;
 - Public Realm Improvements;
 - Employment & Training;
 - Transport - site specific contributions.
- 6.3 It is considered that the optimal planning contributions are being delivered for the proposed scheme in accordance with Hounslow Planning Obligations SPD.

7 SUMMARY AND CONCLUSIONS

- 7.1 Our client, Network Housing Group, is proposing the demolition of the buildings at 3 and 5 St John's Road Isleworth and the redevelopment of the site to provide a part three part five storey residential building of 34 units with associated car and cycle parking and landscaping. The proposed scheme responded to pre-application discussions held in early 2016 between Melek Ergen at Hounslow Council.
- 7.2 This statement demonstrates a robust policy basis which supports the redevelopment of the site and which fully acknowledges the key principles contained within local and national policy. The proposed development will offer a wide range of planning benefits including:
- a) A contribution to Hounslow's housing supply through proposing 34 new residential units.
 - b) The provision of a range of accommodation types from 1-bedroom to 3-bedroom units which address housing needs, including wheelchair accessible units;
 - c) A high quality architectural design which enhances the site and preserves the character of the surrounding area;
 - d) Respecting the amenity of neighbouring residents;
 - e) Provision of 14 x Affordable housing units.
- 7.3 Overall the development is considered to meet strategic planning policy objectives and is in general conformity with other policies and other material considerations. It is therefore considered that the development should be supported.

