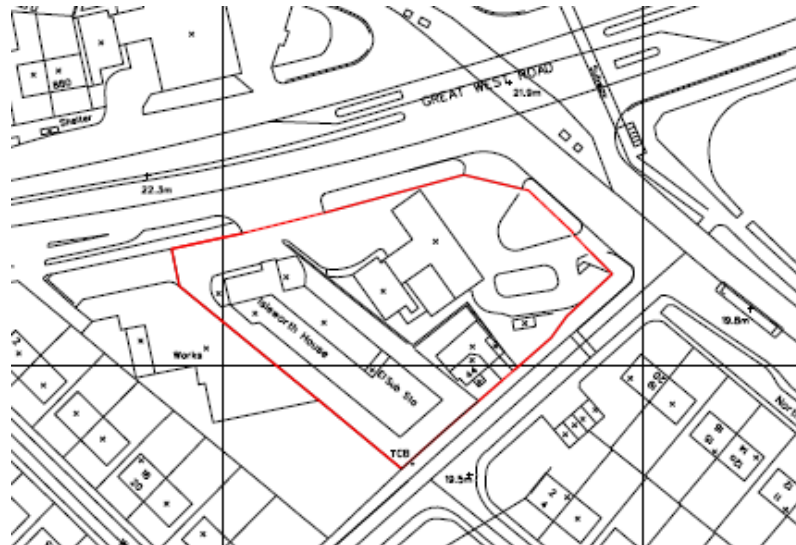

References:	P/2017/0053 00505/AF/P27
Address:	Former Syon Gate Service Station, Land at South of Gillette Corner, Great West Road, Isleworth TW7 5NP
Proposal:	Redevelopment of the Site to provide a mixed-use development with heights between 4 and 11 storeys and including 3 basement levels, comprising up to 102 residential units (Use Class C3), office (B1) and self-storage uses (B8), car and bicycle parking, hard and soft landscaping with all necessary ancillary and enabling works.
Drawing numbers:	3029-LS-P11, 3029-LP-P02, 1994_S_010, E0-001, E1-001, E2-101, E2-102, E2-201, P1-001, P1-101, P1-102, P1-103, P1-104, P1-105, P1-106, P1-107 P1-108, P1-109, P1-110, P1-111, P1-112, P1-113, P1-197, P1-198, P1-199, P2-001, P2-101, P2-102, P3-001, P3-002, P3-101, P3-102, P3-103, P3-104, Design and Access Statement, Framework Workplace Travel Plan; Landscape Masterplan; Sustainability Statement; Energy Statement; Preliminary Ecological Appraisal; Statement of Community Involvement; Flood Risk Assessment and drainage; Heritage, Townscape and Visual Assessment; Economic Report and PRS Schedule; Utilities Report; Wind Assessment; Contamination Report; Acoustic Assessment; Air Quality Assessment; Structural Assessment; Daylight/Sunlight Assessment; Financial Viability Appraisal; Construction Environmental Management Plan; Cost Plan; Affordable Housing Viability Submission, consisting of Appraisal Summary for the proposed development; Summary of estimated PRS rents; Valuation for the proposed self storage unit; Build Cost Estimate; Estimate of CIL liability; Overall area schedule; Residential area schedule; received 05/01/2017; Planning Statement, received 14/02/2017; Transport Assessment, received 15/02/2017; Residential Travel Plan, received 23/02/2017; Supplementary Heritage Appraisal, received 28/02/2017.
Application received:	05/01/2017

1.0 RELEVANT FACTS - SITE AND CONTEXT

- 1.1 The site forms the south-west corner of the junction of Syon Lane and the Great West Road, commonly known as Gillette Corner, owing to the presence of the former Gillette factory on the north-east corner of the junction.



- 1.2 The site is presently surrounded by temporary hoardings and has been cleared of all permanent buildings. It is currently being used for temporary car park for Sky. The site previously contained two office buildings, a petrol station and a garage.
- 1.3 The surrounding area is dominated by the Great West Road (A4), which forms the northern boundary of the site, and is a major arterial route into London. To the south and west of the site is a residential area consisting primarily of two-storey, semi-detached houses. Northumberland Avenue forms the southwest boundary of the site.
- 1.4 Opposite the site to the east is a Homebase retail warehouse; to the north on the other side of the road there is a petrol station and former Gillette factory which currently vacant to the west Adini (office and warehouse) building which bounds the site to the west.
- 1.5 The site is not located in a conservation area, but the former Gillette Factory is a Grade II Listed building and Church of St Francis Assisi, further west along the A4, is also Grade II listed.
- 1.6 There is a historic brick boundary wall that bounds the southern boundary of the application site and the Adini building to the west.
- 1.7 The site has a PTAL rating of 2 which indicates poor.

2.0 RELEVANT PLANNING HISTORY

- 2.1 **00505/AF/P20** Outline application for the demolition of existing petrol station and re-development of site as Car showroom on ground & first floor with basement, ancillary offices and parts store together with associated access and car parking.
Approved 14/07/2005
- 2.2 **00505/AF/P21** Demolition of existing petrol station and the erection of a 2 storey building for use as car showroom/ workshop and offices including car parking and landscaping to existing site.
Withdrawn 13/06/2006
- 2.3 **00505/AF/P22** Redevelopment of site to provide a 8,989 sqm self storage facility (class B8) alterations to access

arrangements, car parking and landscaping to site

Withdrawn 18/02/2008

2.4 **00505/AF/P23**

Redevelopment of site to provide a self storage facility (Class B8), alterations to access arrangement, car parking and landscaping (Revised Application)

Approved with Legal Agreement 02/07/2008

2.5 **00505/AF/P24**

Temporary use of vacant site as storage use (Class B8) for limit of 3 months

Approved 24/03/2015

2.6 **00505/AF/P25**

Erection of part 3/5/6/14 storey mixed use development comprising residential (Use Class C3) - 90 flats (43 no. x one bedroom; 40 no. x two bedroom; and 7 no. x three bedroom) and 3 no. x three bedroom townhouses; retail (Use Class A1); office (Use Class B1a); and self-storage facilities (Use Class B8) over three basement levels; associated car and cycle parking; landscaping; and new access road from Northumberland Avenue/Great West Road.

Withdrawn 05/01/2017

2.7 **00505/AF/P26**

Use as temporary car park until 30 September 2017

Approved 08/12/2016

3.0 DETAILS OF PROPOSAL

- 3.1 This application is for a mixed-use scheme with heights between 4-11 storeys and three storey basement with 7,863 sqm of self-storage space (B8), 783 sqm of ground floor offices (B1) and 102 residential flats above with cycle and car parking and amenity spaces.
- 3.2 Above the ground floor the new building is comprised of two main elements, labelled Building A and Building B. Building A would front the Great West Road and Syon Lane with its height ranging from over 25m next to the Adini building rising to 38m towards the corner where a tower element is located. The depth of the Building A would be over 15m. Along Northumberland Avenue the height of the scheme would be 14m to 17m and the depth of the Building B would be 15.6m deep. A central podium garden between the buildings would provide amenity space.



- 3.3 The scheme would be a mixed use scheme consisting of: 102 residential units made up of 30 studio/one-bedroom flats and 72 two-/three-bedroom flats (10 would be wheelchair units);
- 3.4 The commercial uses would be on the ground level and the basement. The office spaces and storage business reception area would be located along the Great West Road and Syon Lane.
- 3.5 The smaller office spaces are located along the Great West Road which creates number of entrances, the larger offices are located along the Syon Lane. Ancillary kitchens and toilets are to the rear along the corridors. The loading bays are to the rear as well as car and cycle parking and refuse stores.
- 3.6 There is a large residential entrance and vehicular access from the Northumberland Avenue. The loading bays, parking and stores are located to the rear of offices in the centre of the site.
- 3.7 The storage reception area would be on the corner of Syon Lane and the Great West Road and vehicular access is via Northumberland Avenue. The rear loading bay and lifts down to the underground storage areas.
- 3.8 The storage itself is located underground in the proposed basement levels accessed via lifts. The basement levels extend across the majority of the site.
- 3.9 All the residential units are accessed from Northumberland Avenue via 20m wide over 6m high main entrance with a concierge and a lobby. There are two flats at street level on the Northumberland Avenue elevation.
- 3.10 All residential units would be Private Rent Scheme (PRS) tenure and not for individual sales and hence the central entrance with concierge.
- 3.11 The proposal provides 102 flats comprising 12 studio, 18 one bedroom/two persons, 24 two-bedroom/three persons, 4 two-bedroom/four persons, 34 two-bedroom duplexes, 7 three-bedroom/five person, 3 three-bedroom/five person duplexes. 10% of the flats would be wheelchair housing.
- 3.12 The proposal would provide amenity space in form of private amenity, podium garden and terraces.
- 3.13 The proposal would provide 42 residential and 9 commercial car parking spaces and

two additional spaces for visitors at ground floor level, and 40 for long-stay residents, which would be in the basement. There would be a parking space at ground level for car club.

- 3.14 There would be 192 cycle parking spaces for residents within the basement level and a dedicated cycle lift in addition to the two car lifts which is also available for the cyclists. There would be 4 cycle parking spaces, Sheffield stands provided adjacent to the main residential access point off Northumberland Avenue.

4.0 CONSULTATIONS

- 4.1 1,212 residents/businesses, Isleworth Society and Osterley and Wyke Grove Residents Association (OWGRA) were notified on the 10/01/2017. Over 80 objections and one support has been received with the following comments:

Comment	Response
Increased vehicular traffic in the area (Northumberland Avenue, Syon Lane, Great West Road and Gillette Corner junction in particular) causing danger for pedestrians	Para 6.81 – 6.109
Claustrophobic feel as a result of the development	Not a material planning consideration.
Blocking historic views and listed buildings (such as Gillette Tower and Homebase Tower)	Para 6.26-6.49
Out of the area's character (Northumberland Estate in particular)	Para 6.26-6.49
Increased air pollution and noise in the area	Para 6.125 – 6.126
Loss of greenery	There is no greenery within the site.
Inappropriate materials, scale, massing, size and height	Para 6.9 – 6.25
Will result in worse parking situation in surrounding streets	Para 6.81 – 6.109
Insufficient parking space provision	Para 6.81 – 6.109
Unattractive design	Para 6.9 – 6.25
Poor engagement of the developer with the community and lack of proper public consultations	Whilst the Council encourages public consultations, they are not compulsory.
Loss of privacy	Para 6.75 – 6.80
Increased amount of road accidents	Para 6.81 – 6.109

Increased footfall causing obstruction to vehicular traffic	Para 6.81 – 6.109
Loss of outlook	Para 6.75 – 6.80
Additional pressure on local facilities, existing sport facilities are already overcrowded	Para 6.139 – 6.142
Rented serviced apartments will add nothing to the community	In line with London Plan
Little architectural merit	Para 6.9 – 6.25
Excessive overshadowing of neighbouring properties	Para 6.75 – 6.80
Abundance of vacant office space along Great West Road	Office uses are in line with Policy.
Will dominate the skyline of the Golden Mile	Para 6.9 – 6.25
No development of comparable scale in the area	Para 6.9 – 6.25
Reference points (Gillette and Homebase towers) are not appropriate as they are not of the same size, bulk and use.	Para 6.26-6.49
Inappropriate unit size mix	Para 6.56 – 6.74
Inappropriate location for a storage facility	Para 6.1 – 6.7
No regard to the commercial site to its west.	Para 6.26-6.49
Planning application submitted anonymously	Whilst the Council encourages public consultations, they are not compulsory
Low proportion of affordable homes	Para 6.127 – 6.138
Excessive density	Para 6.56 – 6.74
The commercial uses will weaken the community cohesion	Mix use is in line with Local Plan.
The development does not include restoration of the Listed Wall	Para 6.26-6.49
Unwelcomed precedent for another	Para 6.9 – 6.25

comparable developments	
Serviced apartments are being used for anti-social behaviour	Not a material planning consideration.
Disruption to residents due to lengthy construction works	Not a material planning consideration.
The site brought back to viable use	Yes.

4.2 Isleworth Society comment summary:

- Harmful impact upon Grade II listed Gillette Building;
- The proposed building, due to its bulk, height and design, would over dominate the character of the low rise, residential area;
- Detrimental impact upon views towards Gillette Tower from various spots.

4.3 The Twentieth Century Society comment summary:

- No objection in principle to redevelopment of the site;
- Proposed building will significantly diminish the striking visual impact of the Gillette Factory;
- It will form an overly dominant frontage to the junction;
- The application in its current form would constitute harm to a listed building

4.4 Brentford Community Council comment summary:

- Design and Access Statement refers only to Brentford's tall buildings while totally disregards neighbouring Osterley character area;
- Gillette Factory should be the only landmark building at the junction
- The site should be developed with low rise buildings
- Excessive density of the site

4.5 GLA comment summary:

- Lack of affordable housing is unacceptable;
- Revision of western core's massing is encouraged;
- Additional carbon reduction measures to be considered.

4.6 OWGRA reviewed the GLA comment, pointing out a few errors and inconsistencies, regarding the description of the location and surroundings, design and bulk, public transport accessibility and the impact upon the area.

4.7 The application was included on the Pending Decision List dated 24 February – 3

March 2017 (Week 8) as major application.

- 4.8 The application was included on the Pending Decision List dated 7 July – 14 July 2017 (Week 27) for refusal and there was no request for the application to be considered by committee.

5.0 POLICY

Determining applications for full or outline planning permission

- 5.1 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

- 5.2 The National Planning Policy Framework (NPPF) came into force on 27 March 2012 and has replaced national policies and guidance formerly contained in Planning Policy Statements and Planning Policy Guidance notes and some other documents. The Local Planning Authority (LPA) considers that, where pertinent, the NPPF is a material consideration and as such, it will be taken into account in decision-making as appropriate.

The Development Plan

- 5.3 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. The Local Plan documents can be viewed on the Hounslow website.

5.4 Relevant London Plan Policies

- 2.16** Strategic Outer London Development Centres
- 3.3** Increasing Housing Supply
- 3.4** Optimising Housing Potential
- 3.5** Quality and Design of Housing Developments
- 3.8** Housing Choice
- 5.2** Minimising Carbon Dioxide Emissions
- 5.3** Sustainable Design and Construction
- 5.7** Renewable Energy
- 5.13** Sustainable Drainage
- 5.15** Water Use and Supplies
- 5.21** Contaminated Land
- 6.1** Strategic Approach
- 6.9** Cycling
- 6.13** Parking
- 7.2** An Inclusive Environment
- 7.4** Local Character
- 7.6** Architecture
- 7.8** Heritage Assets and Archaeology

8.3 Community Infrastructure Levy

5.5 Local Plan

- SV1** Great West Corridor
- ED1** Promoting employment growth and development
- ED2** Maintaining the borough's employment land supply
- CC1** Context and Character
- CC2** Urban Design and Architecture
- CC3** Tall buildings
- CC4** Heritage
- SC1** Housing Growth
- SC2** Maximising the Provision of Affordable Housing
- SC3** Meeting the Need for a Mix of Housing Size and Type
- SC4** Scale and Density of New Housing Development
- SC5** Ensuring Suitable Internal and External Space
- GB7** Biodiversity
- EQ1** Energy and Carbon Reduction
- EQ2** Sustainable Design and Construction
- EQ3** Flood risk and surface water management
- EQ4** Air quality
- EQ5** Noise
- EQ6** Lighting
- EQ7** Sustainable waste management
- EC1** Strategic transport connections
- EC2** Developing a sustainable local transport network
- IMP1** Sustainable Development
- IMP2** Delivering site allocations
- IMP3** Implementing and monitoring the Local Plan

6.0 ASSESSMENT

The principle of the proposed mixed-use development

- 6.1 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.
- 6.2 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.

- 6.3 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.

- 6.4 In the adopted Local Plan, the application site is allocated (Site Reference 25) for 'Mixed Use' with residential and commercial (light industrial B1b/c or B8 warehousing) identified uses appropriate for the site. The Character and Context Study that supports Local plan defines the site as an opportunity site within a Local Centre.

- 6.5 The Great West Corridor, an area which is recognised as having an economic function of greater than sub-regional importance in the media sector and is currently identified in the London Plan as a Strategic Outer London Development Centre.

- 6.6 Policy SV1 of the Local Plan relates to the Great West Corridor and sets out that the Council will progress a partial Local Plan review to explore and identify the potential capacity for additional employment-led mixed use development along the Great West Corridor. The Partial Local Plan Review will, amongst other things, identify sites with suitability for tall buildings. This site is presently located within the Great West Corridor plan area and the plan review may or may not, provide additional policy support for a form of development at the site. A draft Great West Corridor Masterplan Study is being finalised and is scheduled for public consultation in September 2017. This study will inform the Local Plan review. Whilst the site's inclusion to this Plan has not been secured yet, the principle of office development as well as the storage use on this site is previously accepted/established and the site allocated as mixed use including residential development in the Local Plan and therefore the Council would like to see the delivery of this site in line with its allocation and in accordance with Local Plan policy IMP1 subject to the other planning considerations.

- 6.7 The other main planning issues to consider are:

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

- Urban Design
- Impact on heritage
- The impact on the neighbouring residential units
- Highways, Transport, Access
- Energy and Sustainability
- Environmental considerations; and
- Affordable housing and planning obligations.

Urban design

- 6.8 Local Plan policy CC1 (Context and Character) seeks to ensure that a 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; conserves and takes opportunities to enhance particular features or qualities that contribute to an area's 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; and responds to any local architectural vernacular that contributes to an area's character.
- 6.9 The Hounslow Urban 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.
- 6.10 The Urban Context and Character Study defines a tall building in the borough as any building or structure which is over 20m in height and/or which is significantly taller than the surrounding townscape and/ or which recognisably changes the skyline. As the height of the tallest part of the development is over 38m it would constitute a tall building in terms of the Study and Local Plan.
- 6.11 The site is identified within the Urban Context and Character Study (Osterley and Spring Grove, Character Area L) as part of a local centre, with commercial areas to both the east and west, and also an Opportunity Site with a recommendation for enhancement.
- 6.12 Local Plan policy CC3 (Tall Buildings) outlines the Council's approach to tall buildings. To contribute to regeneration and growth, the Council will support high quality tall buildings in identified locations which accord with the principles of sustainable development.
- 6.13 It goes on to list 12 criteria against which the Council would expect proposals for tall buildings to comply. These are:
- *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;*
 - *Be of the highest architectural design and standards; be attractive, robust and sustainable;*
 - *Be of a scale that reflects their relevance and hierarchical importance when located within a grouping/cluster of tall buildings;*
 - *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;

- 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;*
- Provide for a comfortable and pleasant microclimate which minimises wind vortices and over-shadowing;*
- Provide for biodiversity within the building form and be sensitive to surrounding open spaces including waterways to ensure minimal impact;*
- Take opportunities to enhance the setting of surrounding heritage assets, the overall skyline and views;*
- 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;*
- Use materials and finishes that are robust, durable and of the highest quality, with facades providing innate interest, variety and function;*
- Incorporate innovative approaches to providing high quality, usable, private and communal amenity space where residential uses are proposed; and*
- Comply with the requirements of the Public Safety Zone for London Heathrow Airport, where appropriate.”*

- 6.14 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.
- 6.15 The existing site is derelict, vacant and bound by hoardings and so it detracts from the townscape. Redevelopment of this site would provide an opportunity for environmental and townscape improvements that would benefit the amenity of the area.
- 6.16 The building's curved forms and strong geometry echoes the 1930s factory architecture in the area, and could be considered to be good transition features from the factory and commercial environment northeast of the site. However, there is concern over the scale and bulk of the proposal, which does not bear any resemblance to neighbouring architecture.
- 6.17 The two storey entrance on Northumberland Avenue appears to be a transition between the two ground levels, picking up the much taller ground floor storey of Building A and the ground and first floor of Building B. While it is important to mark the residential entrance, the lobby is around 20m in width, which is not residential in scale. Considering a smaller entrance would appear lost and insignificant against the bulk of the structure behind this itself illustrates in one element just how over-scaled the development is.
- 6.18 The depth of the building A is over 14m extending along the northern and eastern boundaries of the site. This element is proposed to be 5 to 11 storeys in height and taken together the height and width of this element would be a bulky addition

locality.

- 6.19 Building B which fronts the Northumberland Avenue is reduced in height to 15m. Whilst this height is in more proportion with neighbouring residential properties it is still substantially higher than 9m high houses directly opposite.
- 6.20 Overall the proposed building would be very visible due to its height, but taken together with the extent of its frontage along the Great West Road together with its visible 15m depth, it would be a dominant feature and highly conspicuous within the townscape.
- 6.21 The building will also be large and imposing visually consuming sky space along the road. The heavy proportions of the building would significantly change the skyline. The undue prominence of the building would be accentuated by its style which includes a high proportion of glass, resulting in a plethora of different curtain styles which are uncontrollable, and would also result in a large amount of light spill. The elevations include LED lighting and wall luminaires as well as in-planter uplighters which would increase the light spill further, making this development further dominant even in the night in this location, competing with modest lighting of the Gillette clock tower.
- 6.22 The site lies between the listed factory and the residential houses, in a space of transition, and it is considered that any structures appreciably greater in height than the existing suburban structures on Northumberland Avenue would alter the relationship between them. In this occasion, the proposal with its position, size, scale, height and external appearance, would be an intrusive development, out of scale and character with the prevailing pattern of development in the locality and would be contrary to policies CC1, CC2 and CC3.

Impact on heritage

- 6.23 The NPPF sets out that in determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.24 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.
- 6.25 Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.
- 6.26 Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
- 6.27 Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is

necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
 - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - the harm or loss is outweighed by the benefit of bringing the site back into use.
- 6.28 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 6.29 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.30 Local Planning Authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance.
- 6.31 London Plan policy 7.8 (Heritage assets and archaeology) states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- 6.32 Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 6.33 London Plan policy 7.7 (Location and design of tall and large buildings) states that the impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.
- 6.34 Policy 7.4 (Local Character) sets out that Buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass and is informed by the surrounding historic environment.

Local Plan policy CC4 (Heritage) states that the Council will identify, conserve and take opportunities to enhance the significance of the borough's heritage assets as a positive means of supporting an area's distinctive character and sense of history. 6.61 Policy CC4 says the Council will expect development proposals to

- Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance;
- Retain, conserve and reuse a heritage asset in a manner appropriate to its value and significance;
- Demonstrate that substantial harm to or loss of a heritage asset is avoided,

unless exceptional circumstances can be demonstrated, consistent with the NPPF;

- Demonstrate that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (see Glossary), this harm will be outweighed by the public benefits of the proposal, including securing its optimum viable use; or
 - 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.
- 6.35 The context of the Grade II listed Gillette factory has been low-scale development to the south and west, allowing its clock tower to be seen as a landmark across the wider townscape including nearby residential areas. Therefore the low rise suburban scale of residential areas to the south and west are integral to the setting and appreciation of the Gillette factory.
- 6.36 There are three listed buildings in the vicinity of the site that have slender architectural elements: the Gillette factory; the Church of St Francis; and Westlink House. These are the only high-rise elements in the area and are considered to be focal points and landmarks.
- 6.37 The Hounslow Urban Character and Context Study 2014 identifies the site as being within an area that has a high sensitivity to change and which is not suitable for tall buildings. Notably the surrounding area to the south contains suburban scale housing. The Gillette building should remain the dominant feature in the streetscene including in the immediate context as well as long views along the A4.
- 6.38 The site lies between the listed factory and the residential houses, in a space of transition and it is considered that any structures of an appreciably greater height than the existing suburban structures on Northumberland Avenue would unduly alter the relationship between them.
- 6.39 It is considered that the height and massing of the proposed building unduly competes with the clock tower of the Gillette factory and would result in harm being caused to its significance, with the proposed building being a dominant feature, which also overwhelms the nearby suburban housing. In addition, the townscape would be harmed by the imposition of a large and bulky structure on a prominent site.
- 6.40 The form and appearance of proposal would be dominant and highly conspicuous within the townscape. The proportions are heavy and exaggerated by covering 2 storeys within every 'visual' storey. While the style of architecture could be considered to reflect other developments in the area, the bulk would not be sympathetic to the other slenderer and more elegant structures with which it would be experienced. It would create such a definitive visual stop that it would interrupt the character of the Great West Road and provide no visual permeability across an area which has until now been very open and low rise apart from the prominent Gillette tower.
- 6.41 The proposal would therefore be a dominant structure within the townscape and wider landscape, and is out of keeping with the character of the area.

Historic wall

- 6.42 To the site of the site there is an unlisted wall of late 18th century date. It forms the northern edge to Northumberland Avenue extending from beyond Warworth

Gardens eastwards towards Syon Lane. It is red brick, laid in English Bond with a blind neo-classical entrance at its western end, where it returns to the north reaches the Great West Road. This feature is within the adjacent Adini site to the west.

- 6.43 The proposal would remove this wall to accommodate the development. Within the submitted heritage statement the wall is assessed as poor with structural instability and considerable erosion of the fabric with later infill and tile insets. The assessment also shows that whilst the wall lost some of its stone decorative detailing it has clear local interest and it is a non-designated heritage asset.
- 6.44 As outlined the above, following detailed assessment, it is considered that the 11-storey building, with the majority of the bulk set at the front of the site, would harm the setting of the Grade II listed Gillette factory and the townscape in general. This would be contrary to Local Plan policies CC1, CC2, CC3 and CC4.

Housing: Tenure, Density, Mix, Standards & Amenity

- 6.45 London Plan Policy 3.8 (Housing Choice) states that ‘Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments’.
- 6.46 The proposed residential units would follow a Private Rented Sector (PRS) model. These purpose-built private rented homes, held in the longer term for private renting, are variously referred to as Build to Rent. The Mayors Housing SPG notes that the PRS) is the only housing sector to have seen relative growth in recent years. It now houses 30% of all households in London. The Government and the Mayor support provision of more private rented homes and the London Plan recognises that the planning system should take a more positive approach in enabling this sector to contribute to the achievement of housing targets.

Density

- 6.47 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 an ‘Urban’ area where densities of 70-170 units per hectare, or 200-450 habitable rooms per hectare, are given for sites with a PTAL¹ of 2-3.
- 6.48 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.
- 6.49 The density of the proposed development is calculated to be 323 units per hectare or 804 habitable rooms per hectare. The proposal represents a considerably higher density development than suggested by the London Plan. Although density guidelines should not be applied mechanically, they are a useful context to ensure the development reflects the character of an area and to consider the quality of accommodation proposed.

Mix, size & quality

- 6.50 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

¹ Public Transport Accessibility Level.

different community requirements.

- 6.51 London Plan Policy 3.8, together with the Local Plan Policy SC3 seeks the following mix of housing, unless otherwise agreed on the basis of evidence:

Tenure	One bedroom	Two bedroom	Three bedroom	Four bedroom +
Market	30%	40%	25%	5%
Intermediate	35%	40%	16%	9%
Social or Affordable Rent	25%	45%	25%	5%

- 6.52 The proposal delivers the below mix:

Studio	One bedroom	Two bedroom	Three bedroom
11.7% (12)	17.6% (18)	60.7% (62)	9.8% (10)

- 6.53 Whilst the proposal is not entirely comply with the Policy mix, considering that the 77% of units are family sized units, this is acceptable.
- 6.54 Local Plan policy SC5 requires development proposals to demonstrate compliance with the Nationally Described Space Standards. All units have been designed to meet or exceed the minimum space standards.
- 6.55 The provision of 37 duplex units along the Great West Road elevation is a design response to address large north aspect of this site. The duplexes work to avoid north facing single aspects units and increase the number of units with south facing living rooms and balconies.
- 6.56 A mix of one and two bedroom units line the internal elevations of Building A. To the north of Building A, each flat has a balcony or terrace which looks over the podium garden. The façade pattern opens up along these elevations to allow for larger openings for the balconies and living room windows. The external ‘fins’ of the elevation are used to prevent internal overlooking.
- 6.57 To the east of Building A there are three levels of flats which look towards Syon Lane and the junction. These are largely studios and one bedroom units. The location of these flats are not suitable to have balconies due to the busy junction and winter garden option dismissed considering to the impact on the elevations if to be used as storage spaces. However the deficiency of amenity space for these flats are compensated with large internal spaces and there would be a roof terrace amenity space above these flats.
- 6.58 The proposal would have a large massing along the Great West Road creating a corridor along this edge. Due to the whole development being access from one single entrance there would be large corridors every second floor serving 22 flats which much more than suggested one core for 8 units in the Mayors Housing SPG. Whilst this approach diminishes the single aspect north facing units this also gives the indication of over development of this site in terms of depth and height of the proposed buildings.
- 6.59 To improve the feel of this long corridors there are break-out spaces for the communal use, however in conclusion the two long corridors on podium and third floors serves 22 flats.
- 6.60 Due to the number of units, the design approach was to use ‘fins’ between habitable rooms to ensure there would be no overlooking. Between the building A and B the habitable room to habitable room distances are 24 metres and if it is to the flank 14m.

These distances are considered acceptable to ensure no direct overlooking between the proposed flats and the proposal raises no privacy issues.

- 6.61 The submission includes a daylight and sunlight report to confirm that the proposal is in line with the BRE Guidance and new flats would receive satisfactory day and sun lights.
- 6.62 Local Plan policy SC5 requires residential developments to meet private external amenity space requirements.
- According to this policy: a minimum of five square metres of private outdoor space should be provided for each 1-2 person dwelling and an extra square metre should be provided for each additional occupant of any dwelling;
 - Communal external space should be provided at no less than the following standards for each flat: up to three habitable rooms 25 square metres / four habitable rooms 30 square metres / five habitable rooms 40 square metres.
- 6.63 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.
- 6.64 There would be 20 flats without any private amenity spaces as they are mostly facing busy junction and it is agreed that open balconies in that location would not be usable or healthy. All other flats comply with private amenity space requirements and all 82 flats provide spacious, usable private amenity spaces.
- 6.65 The amenity space provision of this proposal would combine private amenity, podium garden and terraces. The large massing in this instance helps to work as a sound barrier and the podium level provides a good, usable communal amenity space. Two terraces along the perimeter of the site provide additional external amenity space. Although they border the surrounding roads, due to the height of these spaces, the noise impact would be reduced to provide usable amenity spaces. Addition to those the building has been set back from the boundaries and this allows introduction of some greenery and improves the pedestrian environment and provide a visual amenity.
- 6.66 The proposal in accordance with SC5 would require 2,600 sqm [(92 x 25) + (10 x 30)] amenity space. The provision is stated below:

Private Amenity Space	Communal Amenity Space
966 sqm	Podium: 528 sqm Communal terraces: 225 sqm + 283 sqm
Total	2,002 sqm (77% provision)

- 6.67 Whilst it is not a 100% provision, considering the location and restrictions of the site the quality and amount of provision is considered to be acceptable in this instance.
- 6.68 Furthermore the proposal provides play spaces for the 0-5 age group within the podium courtyard as a safe, supervisable space for play in line with London Plan.

Impact on neighbouring residential units

- 6.69 Immediately to the west (fronted by the Adini building) are commercial uses whilst

beyond are residential properties along Warkworth Gardens, mainly two-storey semi-detached houses. This area of housing extends around the site to the south.

- 6.70 The proposal would not result in any loss of privacy to existing neighbours as properties in Warkworth Gardens would be set over 32 m away from the flank of Building B.
- 6.71 The flank of No. 2 and 4 Hexham Gardens are positioned 25m from the south flank of Building B, due to this distance, the proposal is not considered to be harmful to this neighbouring amenities in terms of loss of privacy and outlook.
- 6.72 The application accompanied with a daylight sunlight assessment to justify the proposal. The results from these assessments demonstrate that the proposed development will have little effect on neighbouring buildings or dwellings in terms of daylight and sunlight with in line with BRE guidance.
- 6.73 The submission shows that there would not be an unacceptable impact on living conditions of neighbouring residential properties.
- 6.74 Vehicle movements associated with the use of this site would not expected to harm the neighbours' living conditions.

Traffic and Highways considerations

- 6.75 The NPPF requires all developments that generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment (TA). 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.
- 6.76 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.
- 6.77 Policy 6.1 emphasises the importance of closer integration of transport and development and seeks to achieve this by:
- 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.
- 6.78 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.
- 6.79 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,
 - provide on-site changing facilities and showers for cyclists,
 - facilitate the Cycle Super Highways,
 - facilitate the central London cycle hire scheme.
- 6.80 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 but also meet the minimum disabled and cycle parking standards specified. In addition, new developments should ensure that 1 in 5 parking spaces provide an electrical charging point to encourage the uptake of electric vehicles, with a further 10% to be provided in the future.
- 6.81 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.
- 6.82 The site has a PTAL of 2 and is therefore considered to have poor accessibility to public transport. Notwithstanding the PTAL, the site is less than 200m from Syon Lane station and bus stops serving the H91 and H28 bus routes. The Syon Lane Station CPZ borders the site to the south and west and restricts parking to permit holders only between the hours of 9am-5pm, Mon-Fri.
- 6.83 There are a number of existing crossovers to the site on Great West Road, Syon Lane and Northumberland Avenue. The proposed temporary use of the site for car parking by Sky employees utilises an existing access on Northumberland Avenue.

The former use of the site was as a petrol filling station with office buildings and a garage.

- 6.84 Car ownership data for the locality has been derived from the 2011 Census. It gives a car ownership ratio for owned flatted accommodation of 0.83 to 1 for cars/dwellings. Applying this rate to the proposed 102 residential units results in an estimated car ownership equating to 85 cars.
- 6.85 In this case, 42 spaces for the residential units would be located within the basement for the 102 residential units. While this ratio is well below the surrounding area's car ownership rate, the lower provision would be consistent with the London Plan and Local Plan's aims of reducing car dependency and private car trips. Overspill parking would be restricted by the CPZ surrounding the site – for which future residents of the scheme would not be eligible for permits via a clause in the any S106 agreement – and by existing kerb-side parking restrictions. Further measures proposed to mitigate the comparatively low on-site parking ratio are provided through a residential travel plan and by providing a car club space.
- 6.86 10 of the residential parking bays in the basement would be disabled bays, which is in line with the number of wheelchair units to be provided. 21% of the spaces would have Electric Vehicle charging points with an additional 19% shown as having a passive provision. This is roughly in accordance with the London Plan standards (20% and 20%). 6 motorcycles bays are also shown.
- 6.87 There would be 2 dedicated lifts to transfer cars between the basement and street level. Further details of how the lift would operate and be managed are required to ensure that queues don't build up on either level.
- 6.88 2 visitor parking spaces and a car club space have been identified next to site entrance from Northumberland Avenue –.
- 6.89 If proposal is to be approved, a Car Park Management Plan is required to ensure that the on-site spaces are managed efficiently, the designated disabled and EV charging bays are available when necessary, and parking is restricted to marked bays only.
- 6.90 Car parking for commercial uses: 9 spaces would be provided for the commercial use within the gated loading bay area, 1 of which would be a disabled bay. 2 active EV charging points and 2 passive points have been identified which accords with the London Plan.
- 6.91 The Transport Assessment used survey data from comparable sites to estimate the number and type of trips that the different uses would generate. Within the AM peak (08:00-09:00) there would be 17 trips associated with the self-storage use, 86 for the residential use, and 29 for the office use. Within the PM peak (17:00-18:00) there would be 34 trips associated with the self-storage use, 48 for the residential use, and 27 for the office use. The modal split was derived from 2011 Census data for the Mid-Super Output Area in which the site is situated and considers the lower car ownership rate that the site would allow. The results estimate that trips by private car would be approximately 38 in the AM peak (08:00-09:00) and 47 in the PM peak (17:00-18:00).
- 6.92 The Transport Assessment assumes that the majority of self-storage traffic will arrive and depart via the A4 Great West Road while peak hour counts of traffic movements from Hexham Gardens have been used to estimate the distribution of residential traffic from the development. This distribution data was used to calculate the impact on the Northumberland Avenue/Syon Lane junction and shows that the junction would continue to operate within capacity. Beyond this, any additional traffic

associated with the development would be insignificant, equating to less than 1 vehicles every 3 minutes on any arm of the Great West Road/Syon Lane junction.

- 6.93 It is accepted that the Northumberland Avenue/Syon Lane junction modelling does not fully reflect the observed queues at this junction, however, it is asserted that these queues are the result of vehicles queueing at the signals at the junction of Great West Road with Syon Lane preventing traffic from exiting or entering Northumberland Avenue. The queues are short lived and dissipate when traffic on Syon Lane receives a green signal. Based on the modelling outputs there will be no changes in theoretical queue lengths on Northumberland Avenue. However, to remedy the existing situation and to improve actual queue lengths, it is proposed to implement yellow box markings on Syon Lane in place of the advisory “keep clear” markings.
- 6.94 Site access: The sole vehicular access would be from Northumberland Avenue via a two-way access road. The access would be 1.8m from the site boundary therefore providing insufficient pedestrian visibility to the west which requires to be rectified to prevent harm to pedestrian safety if application to be approved. To allow access to the site by HGVs, 2 on-street parking bays would need to be removed. The submitted parking survey indicates that the loss of these bays would not result in excessive parking stress on the surrounding streets – this will require changes to the overarching Traffic Management Order which is subject to its own separate consultation and process. A Stage 1 Safety Audit has been provided which highlighted that utility cabinets will need to be relocated on either side of the proposed crossover. Measures to safeguard cars exiting the northernmost lift will need to be incorporated.
- 6.95 Cycle parking for residential: The London Plan standards require a minimum 174 spaces for the residential units whereas the Transport Assessment states that 196 cycle parking spaces would be accommodated at basement level. Although the number of spaces would comply with the London Plan standards, the situation of all of the residential provision at basement level, with some isolated from the cores of the building, would not be convenient for regular use. Policy EC2 of the Local Plan requires cycle parking to be provided at ground level and close to cores if approved further amendments would be required to regulate this.
- 6.96 A dedicated lift in the south-west corner of the building would take cycles from the basement to street level although they would also be able to use the car lifts. While the dedicated cycle lift is welcome, it needs to be increased in size to cater for multiple users at a time (eg parents accompanying children or people leaving at peak times). The exit to the street should be directly in front of the lift.
- 6.97 Cycle parking for commercial 2 separate cycle stores would be provided off the loading area for the commercial uses and would have a cumulative provision of 28 spaces. The specification of the racking system would be condition to any approval. In addition to long stay space for employees, the London Plan also requires visitor space to be provided. No visitor cycle parking has been identified however there is an opportunity to provide some along the Syon Lane and Great West Road frontages, convenient to the entrances to the commercial areas, again if approved this could be conditioned.
- 6.98 2 Sheffield stands, 4 spaces, have been shown near the Northumberland Avenue entrance to the site for short-stay use. While this number of visitor spaces and their situation is acceptable for visitors to the storage use, it is not convenient to the office’s entrances where there appears to be space. As such we would expect further short stay cycle parking to be provided to the north of the site and in close

proximity to the main office's entrances and this could also be conditioned.

- 6.99 Walking and cycling environment: The submission included pedestrian and cycle environment review surveys of the respective infrastructure around the site.
- 6.100 The surveys found that the pedestrian and cycling environment surrounding the site was either of good or average quality and did not identify any areas that required improvement. Notwithstanding the findings of the survey, it must be recognised that the Great West Road which runs along the north of the site is an extremely busy route and forms part of the TfL's strategic road network, while its junction with Syon Lane operates at or near capacity during peak hours. This situation does not create a pleasant environment for pedestrians or cyclists and is not conducive to encouraging a shift to these more sustainable modes of travel. To address this, the main entrance into the residential units and cycle storage would be from the south, off Northumberland Avenue, where the negative effects of the site's location would be least perceptible. Furthermore, as Syon Lane station and the nearest town centres are all reached by setting off in a southerly direction, it is reasonable to assume that many future residents will not have to interact with the Great West Road on a regular basis. When residents will have to walk north, east, or west from the site, they will have the benefit of at-grade signalised crossings in close proximity to the site.
- 6.101 The proposal would allow the redundant vehicle crossovers, onto Great West Road and Syon Lane, to be reinstated to footway and cycle track thereby connecting previously disjointed pedestrian and cycling routes and improving highway safety. The setting back of the building from the site boundary would also provide more space for the movement of people around the site. These changes will need to be agreed with the council and TfL by way of s38/s278 agreements. To this end, a plan is requested which shows the site boundary and the building line overlaid on to the highways register which is available on the council's website.
- 6.102 Delivery and servicing: All servicing including refuse and residential deliveries will take place on site. Swept path analysis has been undertaken to demonstrate that vehicles can manoeuvre from Syon Lane to the site and enter and exit the site in forward gear. A Delivery and Servicing Plan will be conditioned to ensure that no deliveries or servicing is undertaken from the public highway and to minimise the amount and distance of trips, particularly during peak hours. The plan will need to include details of how the gates will be operated to ensure vehicles, whether expected or not, can access the site to turn without having to reverse onto the public highway.
- 6.103 It is therefore considered the proposals would not have a prejudicial impact on the safe and efficient operation of the local road network, would not result of unreasonable traffic to and from the site and would be in accordance with adopted Local Plan policies.

Energy and Sustainability

- 6.104 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 adopted Local Plan encourage sustainable development through 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 a clear thread running through the NPPF.
- 6.105 Developments are required 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.

- 6.106 London Plan Policy 5.2 (Minimising carbon dioxide emissions) requires developments to make the fullest practicable contribution to minimising CO2 emissions following the energy hierarchy:
- Be Lean: use less energy
 - Be Clean: supply energy efficiently
 - Be Green: use renewable energy
- 6.107 It goes on to state 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 and that where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure the delivery of carbon dioxide savings elsewhere.
- 6.108 The Mayor aims to ensure that major developments reduce carbon dioxide emissions from buildings by 35% against a Building Regulations Part L (2013) baseline.
- 6.109 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. It goes on to state that where appropriate developments should make a financial contribution to an agreed borough-wide programme for carbon reductions where required reductions cannot be achieved on-site.
- 6.110 An Energy Statement have been submitted with the application which set out how the development would secure a cumulative carbon dioxide reduction of 29.9% against a Building Regulations Part L (2013) compliant baseline which is less than required 35%, and has therefore proposed a Carbon Offset Fund payment to mitigate the shortfall. Such a contribution would be in accordance with sustainability objectives and would be secured through a s106 agreement in the event that the application has been recommended for approval.

Environmental Considerations

Contaminated land

- 6.111 Owing to the history of uses, the site the site likely to be contaminated. 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.
- 6.112 Policy 5.21 (Contaminated Land) of the London Plan and Local Plan Policy EQ8 (Contamination) provide the policy context.
- 6.113 In the event of an approval, a condition would have been proposed to ensure that the risk of land contamination would be minimised.

Flooding and drainage

- 6.114 If the application approved there would be conditions to ensure the surface water management is in line with current planning policy and guidance requirements.

Ecology

- 6.115 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;"
- 6.116 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".
- 6.117 Adopted 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.
- 6.118 The nature and location of the site limits its ecological value. In the event of a recommendation for approval, a planning condition could have secured a scheme for biodiversity enhancements at the site.

Noise and air quality

- 6.119 The submission includes noise and air quality assessments and the future occupants would be protected by windows with high specifications. If approved this would be conditioned.
- 6.120 In terms of development's impact on noise and air quality to the surrounding area, for during construction times, if application to be approved can be mitigated by conditions and after the construction the proposed uses are assessed to be in line with Local Plan and not to be detriment to the neighbouring amenity.

Affordable Housing and Planning Obligations

- 6.121 London Plan Policy 3.11 (Affordable housing targets) states that the Mayor and the boroughs should seek to maximize affordable housing provision to ensure that at least 17,000 more affordable homes per year are delivered in London across the Plan period. 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing.
- 6.122 In setting their affordable housing targets boroughs are required to assess the economic viability of land for housing. This has recently been carried out at Local Plan Examination in Public (2015) and the policy target was based on a Viability Study which showed 40% onsite affordable housing was achievable, especially in higher value locations.
- 6.123 Policy 3.12 (Negotiating affordable housing) states that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:
- a) current and future requirements for affordable housing at local and regional levels
 - b) affordable housing targets
 - c) the need to encourage rather than restrain residential development

- d) the need to promote mixed and balanced communities
- e) the size and type of affordable housing needed in particular locations
- f) the specific circumstances of individual sites
- g) resources available to fund affordable housing
- h) the priority to be accorded to provision of affordable family housing

6.124 Affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

6.125 The Mayor's Housing SPG (2016) provides guidance on the implementation of the housing policies within the London Plan.

6.126 Local Plan Policy SC2 (Maximising the provision of affordable housing) states that the Council has set a strategic target that 40% of additional housing delivered across the borough between 2015 and 2030 be affordable.

- i) Seek the maximum reasonable amount of affordable housing on a site by site basis on all sites with a capacity to provide ten or more homes with reference to the strategic borough-wide target of 40% of all new housing as affordable
- j) Employ a review mechanism upon partial or full completion of a development when financial viability assessments demonstrate that current market conditions will support less than 40% affordable housing
- k) Recognise that development proposals with a significant amount of existing floorspace will result in a lower CIL liability which could further enhance viability for the delivery of a greater proportion of affordable housing than would otherwise be achievable. Vacant Building Credit (VBC) will also be applied in this context whereby the Council will seek the maximum reasonable amount of affordable housing across areas of increased floorspace, recognising improvements in overall viability that may have been secured through the application of VBC on existing floorspace; and
- l) Deliver and support the delivery of affordable housing through other sources of supply, such as local authority new builds, reuse of empty homes and various forms of specialist housing.

6.127 The Council will expect development proposals to:

- a) Provide an open book financial viability assessment and any supporting evidence to demonstrate the maximum provision of on-site affordable housing is being proposed on sites with a capacity for 10 or more homes, with reference to the 40% strategic affordable housing target as well as the impacts of existing floorspace through VBC and reduced CIL liability. Developers may also be asked to facilitate an independent viability assessment by a third party where requested by the council;
- b) Provide affordable housing on-site, unless the council considers that such provision is not practical or feasible, in which case off-site provision or appropriate cash in-lieu payments may be considered in exceptional circumstances;
- c) Deliver a mix of 60% affordable/social rented and 40% intermediate tenures on all

qualifying sites; and

d) Provide an appropriate mix of both housing size and tenure in accordance with housing need

- 6.128 A Viability Assessment submitted with the application which concluding that the development cannot viably provide any affordable housing. This submission have been scrutinised by the Council's third party consultants. The review concluded that the scheme is substantially in deficit and it is not possible to see any reason why a rational developer would wish to proceed with the scheme on the basis proposed.
- 6.129 Subsequently, the applicant made an offer of affordable housing to the Council. This offer was 15 residential units (totalling 17% of habitable rooms across the site) to be designated as affordable (Discount Market Rent – London Living Rent) comprising 5 x three-bedroom flats and 8 x two-bedroom flats (to be split / 5 x two-bed four-person and 3 x two-bed three-person) and 2 x one bedroom flats.
- 6.130 After this offer, in addition to the independent assessment commissioned by the Council the, Mayor London's Viability team also reviewed the submission and they also concluded that: "The reason this scheme is so unviable is that it is poorly conceived. Values in this location do not support such intensive over development with high rise buildings. The self-storage and PRS elements cost substantially more to build than they are worth. That assumes no affordable housing is included. The offer of 15% AH (17% by habitable rooms) makes it even more unviable. An alternative tenure of market housing has not been tested and the applicant may be considering applying for a change in tenures once the principle of development on this scale has been accepted."
- 6.131 The final offer from the applicant came as 20% London Living Rent as previously. Furthermore they clarified that it is a commercial risk they are taking and the applicant has a long-term approach to the site. They confirmed their intention to deliver this scheme once planning permission is granted.
- 6.132 Whilst the Council accepts that the scheme is unviable and no affordable housing can be included, the viability position clearly shows that it is not sustainable development in accordance with the NPPF. In this regard, the costs of the scheme alone are so great that they render the scheme unviable, contrary to the NPPF's² assertion that in order for a scheme to be considered deliverable, it must 'in particular' be viable. The viability demonstrates that the scheme would result in a loss. Because the scheme has been designed in such a way as to render it unviable, even without any affordable housing provision, the reasonable maximum amount of affordable housing which could potentially delivered on the site will not be realised and so the current scheme is not in accordance with Local Plan Policy SC2 and London Plan Policy 3.11.
- 6.133 In terms of planning obligations, negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the Local Plan Policy IMP3 (Implementing and monitoring the local plan) 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

² Footnote 11 of the NPPF.

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.

6.134 A Section 106 agreement may not address all of the impacts of a development since some of these may be addressed by CIL, in order to satisfy the Regulation 122 tests above.

6.135 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.

6.136 Because elements of the proposed development were found to be unacceptable, the heads of terms that would be appropriate in the event of a recommendation for approval have not been agreed between the Council and the applicant.

7.0 EQUALITIES DUTIES IMPLICATIONS

7.1 The Council has to give 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.

8.0 COMMUNITY INFRASTRUCTURE LEVY

8.1 Some new developments granted planning permission on or after 1st April 2012 will be liable to pay Community Infrastructure Levy (CIL) to the Mayor of London with respect to the funding of Crossrail. This is at the rate of £35 per m² of new floor space.

8.2 This proposal is not liable to pay Community Infrastructure Levy.

9.0 THE PLANNING BALANCE AND CONCLUSIONS

9.1 This development would bring with it a number of important benefits. It would bring forward 102 new homes in the Borough, which would make a significant contribution towards ensuring that the Borough continues to meet its housing need.

9.2 The site is currently vacant and it makes a poor contribution to the townscape. Therefore its redevelopment provides an opportunity to improve the appearance of the site and enhance the character of the area.

9.3 The applicant sets out that the development on this site would bring the long term vacant site into beneficial use and would be in line with the Great West Corridor Plan and the Council's vision. The Council needs to make decisions with reference to the policy position as it stands now. The degree of harm to the significance of a heritage asset needs to be taken into account when there is a proposal which is not considered to preserve the special interest of the asset. Ideally there should be no reason to accept the harm if it can be designed-out of the proposal.

9.4 Substantial harm is considered to be extremely rare, and yet less than substantial

harm can also be considerable or significant, both of which would need comparable levels of public benefit to outweigh the harm. There is no provision within national legislation to properly assess 'less than substantial harm' or these lesser terms of harm, therefore NPPF para 134 requires the harm to be outweighed by a similar degree of public benefit.

- 9.5 As outlined within the report, it is considered that the construction of an 11 storey building, with the majority of the bulk set at the front of the site, would be harmful to the townscape, including the setting of the Grade II listed Gillette factory and to the other listed buildings in the vicinity.
- 9.6 The development would conflict with various policies of the Development Plan. The bulk, scale, height and external appearance of the would cause harm to heritage assets building would not be in scale and character with the prevailing pattern in this location and its scale and visual isolation would cause harm to the wider character of the area and the skyline.
- 9.7 Although an element of affordable housing has been offered, the scheme is not viable and so this housing would be unlikely to be delivered.
- 9.8 Overall, the harmful effects of the development, including on heritage assets, would not be outweighed by the public benefits of the proposal.
- 9.9 The proposals unviability together with the above considerations would not constitute sustainable development and permission is recommended to be refused as it would conflict with policies of the Development Plan and the NPPF.

10.0 RECOMMENDATION: REFUSE (FPREFUSE)

Reasons:

1. The proposal, by reason of its position, size, scale, mass, design and external appearance, would be an intrusive development, out of scale and character with the prevailing pattern of development in the locality, would cause harm to the character of the wider area, as well as having a serious and adverse effect on the amenities enjoyed by occupants of neighbouring properties. It would be contrary to London Plan Policies 7.4 (Local Character), 7.6 (Architecture), 7.7 (Location of tall buildings and large buildings) and Local Plan Policies CC1 (Context and Character), CC2 (Urban Design and Architecture), CC3 (Tall buildings) and the aims and objectives of the National Planning Policy Framework.
2. The proposal, by virtue of its location, scale and design, would cause harm to the setting of nearby designated heritage assets. It has not been demonstrated that the substantial harm would be necessary to achieve substantial public benefits that outweigh that loss, or that the public benefits of the proposal would outweigh the harm caused. The development is contrary to London Plan Policies 7.8 (Heritage assets and archaeology), 7.7 (Location and design of tall and large buildings) and 7.4 (Local character) and Local Plan Policies CC4 (Heritage), CC3 (Tall buildings) and the aims and objectives of the aims and objectives of the National Planning Policy Framework.
3. The proposal is not sustainable development. Its characteristics render it unviable, even without any affordable housing provision, and so the maximum reasonable amount of affordable housing which could potentially be delivered on the site will not be realised, and thus the current scheme is not in accordance with London Plan Policy 3.11 and Local Plan Policy SC2 and the objectives of the National Planning Policy Framework.

CONSULTATIONS CHECKED		<input checked="" type="checkbox"/>	
CIL LIABLE	YES	<input type="checkbox"/>	NO <input type="checkbox"/>
DRAFT LIABILITY NOTICE		<input type="checkbox"/>	LIABILITY NOTICE <input type="checkbox"/>
ADVISE ENFORCEMENT OF DECISION	YES	<input type="checkbox"/>	NO <input type="checkbox"/>
PENDING LIST – WEEK NUMBER	27		
LANDFILL	YES	<input type="checkbox"/>	NO <input type="checkbox"/>
AUTHORITY TO ISSUE (Initials)		MS cleared 11.8.17	