

GREATER LONDON AUTHORITY

(By email)

Our reference: MGLA290322-7984

Date: 25 April 2022

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 28 March 2022. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

I would be grateful if you could supply me with details of any pre-application meetings held with developers, GLA and TfL officers in relation to planning applications submitted on land at Tesco and Homebase Osterley in the London Borough of Hounslow.

Both applications were subject to recent MoL Stage 2 reports and there is reference to the pre-application meetings in the reports.

I would be grateful if you could forward minutes/details of these meetings and of any Planning Performance Agreements entered into

Please find attached the information we hold within the scope of your request.

The GLA's pre-application advice notes have been superseded by the Mayor's Stage 1 and 2 reports which can be found via the following links which provide the GLA's position on the planning applications:

- Homebase Stage 1 and 2 reports – can be found [here](#).
- Tesco Stage 1 and 2 reports – can be found [here](#)

Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA290322-7984.

GREATER**LONDON**AUTHORITY

Yours sincerely

Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Tesco Extra, Syon Lane, Osterley

meeting date: 5 September 2019

meeting time: 10.30 to 12.30

location: 4.6w City Hall (Please ask for [REDACTED] in the GLA planning admin team at reception)

The proposal

Outline application (with all matters reserved except access) for the demolition of the existing Tesco store and redevelopment to provide approximately 1,650 residential units, with supporting commercial, employment and community use in Class A1-3, B1, D1 and D2) in building heights ranging from 4 to 16 storeys, together with public open space and car parking. The site is being progressed in parallel with the Homebase site, Syon Lane.

The applicant

The applicant is x and the architect is x

Background

In July 2019, the GLA received a request for a pre-application meeting to discuss the above proposal at the above site. The pre-application meeting and proposed development is linked with concurrent pre-application proposals for the redevelopment of the Homebase site on Syon Lane to the South of the A4 Great West Road for which a pre-application meeting is scheduled for 19 September. Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion:

1. Introductions

2. Background

- Summary of linked development proposals and applications
- Update on discussions with the Council

3. Presentation of the scheme by the applicant (circa 30 mins)

4. Land use principle and opportunity area context

5. Housing and affordable housing

- affordable housing and viability
- affordability
- housing choice/mix
- children's play space

6. Urban design & heritage

- Design, layout and public realm
- height, massing, townscape and architectural approach
- residential quality and density
- inclusive design
- heritage

7. Transport

- Car parking, cycle parking, Transport Assessment, movement and healthy streets, public transport impact/mitigation measures, travel plan, deliveries, servicing and construction logistics

8. Energy

9. Next steps and AOB

Attendees

GLA group

- [REDACTED], Principal Strategic Planner, GLA (case officer)
- [REDACTED] – Team Leader, GLA
- [REDACTED] – Principal Strategic Planner/Urban Design, GLA
- [REDACTED], Assistant Planner, GLA
- [REDACTED] – Area Manager, Housing & Land, GLA
- [REDACTED] – Principal Planner, Transport for London (TfL)

Applicant team

- [REDACTED] - St Edward
- [REDACTED] - St Edward
- [REDACTED] - St Edward
- [REDACTED] - St Edward
- [REDACTED] - St Edward
- [REDACTED] - WSP | Indigo Planning
- [REDACTED] - WSP | Indigo Planning
- [REDACTED] – HTA
- [REDACTED] - HTA
- [REDACTED] - RDHV
- [REDACTED] - Tesco

Local planning authority

- [REDACTED] – Hounslow Council

for further information, contact GLA Planning Unit:

[REDACTED]
[REDACTED] [REDACTED]

Pre-application meeting agenda GLA/5242

Homebase, Syon Lane

meeting date: 19 September 2019

meeting time: 10.00 to 12.00

location: 4.7w City Hall (Please ask for [REDACTED] in the GLA planning admin team at reception)

The proposal

Mixed use development comprising over 500 residential units and approximately 10,700 sq.m. of retail floorspace.

The applicant

The applicant is **Berkeley St Edward** and the architect is **Patel Taylor**

Background

In July 2019, the GLA received a request for a pre-application meeting to discuss the above proposal at the above site. The pre-application meeting and proposed development is linked with concurrent pre-application proposals for the redevelopment of the existing Tesco Extra on Syon Lane to the north of the A4 Great West Road (GLA ref: 5244) for which a pre-application meeting was undertaken on 5 September. Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion:

1. Introductions

2. Background

- Summary of linked development proposals and phasing
- Update on discussions with the Council

3. Presentation of the scheme by the applicant (*circa 30 mins*)

4. Land use principle and opportunity area context

5. Housing and affordable housing

- Affordable housing and viability
- Affordability
- Housing choice/mix
- Children's playspace

6. Urban design & heritage

- Design, layout and public realm
- height, massing, townscape and architectural approach
- residential quality and density

- inclusive design
- heritage and townscape views

7. Transport

- Car parking (existing v proposed levels), cycle parking, Transport Assessment, site access, movement and healthy streets, public transport impact/mitigation measures, travel plan, deliveries, servicing and construction logistics

8. Energy

9. Next steps and AOB

Attendees

GLA group

- [REDACTED], Principal Strategic Planner, GLA (case officer)
- [REDACTED] – Team Leader, GLA
- [REDACTED] – Team Leader Urban Design, GLA
- [REDACTED] Assistant Planner, GLA
- [REDACTED] – Principal Planner, Transport for London (TfL)

Applicant team

- [REDACTED] - Berkeley St Edward
- [REDACTED] - Berkeley St Edward
- [REDACTED] – Berkeley St Edward
- [REDACTED] - Tesco
- [REDACTED] - WSP | Indigo Planning
- [REDACTED] - Patel Taylor
- [REDACTED] – Patel Taylor
- [REDACTED] – ARC
- [REDACTED] – KM Heritage
- [REDACTED] - RDHV
- [REDACTED] – Murdoch Wickham

Local planning authority

- [REDACTED] - Hounslow Council

for further information, contact GLA Planning Unit:

[REDACTED]
 [REDACTED] @london.gov.uk

GREATER **LONDON** AUTHORITY

[REDACTED]
Indigo Planning
Aldermay House
10 - 15 Queen Street
London, EC4N 1TX

Our ref: GLA/5244/01/ADR
Date: 21 October 2019

Dear [REDACTED]

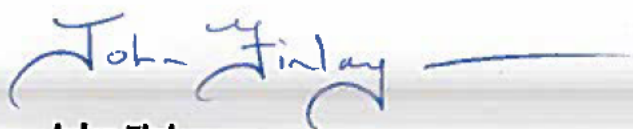
**Town & Country Planning Act 1990 (as amended); Greater London Authority
Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008**

Tesco Extra, Syon Lane, Osterley, London Borough of Hounslow
Our reference: GLA/5244

Further to the pre-planning application meeting held on 5 September 2019, I enclose a copy of the GLA's pre-application assessment (pre-application report GLA/5244/01) which sets out our advice and matters which will need to be fully addressed by any future application.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,



John Finlayson
Head of Development Management

cc Lucinda Turner, TfL
[REDACTED] - St Edward
[REDACTED] Tesco

21 October 2019

Tesco Extra, Syon Lane, Osterley

in the London Borough of Hounslow

The proposal

Redevelopment of the site to provide residential-led mixed use scheme, comprising approximately 1,650 residential units, with supporting commercial, employment, leisure and community floorspace in Class A1-A4, B1, D1 use, within building ranging in height from 4 to 16 storeys, together with public open space and car parking.

The applicant

The applicant is **Berkeley St Edward** and the architect is **HTA Design LLP**

Context

1 A request was received in July 2019 for a pre-planning application meeting with the Greater London Authority (GLA) to discuss a proposal to develop the above site for the above uses. On 5 September 2019, a formal pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- [REDACTED], Principal Strategic Planner, GLA (case officer)
- [REDACTED] – Team Leader – Development Management, GLA
- [REDACTED] – Team Leader, Urban Design, GLA
- [REDACTED] et, Assistant Planner, GLA
- [REDACTED] – Principal Planner, Transport for London (TfL)

Applicant team

- [REDACTED] – St Edward
- [REDACTED] – St Edward
- [REDACTED] – St Edward
- [REDACTED] – St Edward
- [REDACTED] – WSP | Indigo Planning
- [REDACTED] – WSP | Indigo Planning
- [REDACTED] – HTA
- [REDACTED] – HTA
- [REDACTED] – RDHV
- [REDACTED] – Tesco

Local planning authority

- [REDACTED] – Hounslow Council

2 The advice given by officers does not constitute a formal response or decision by the Mayor regarding future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Site description

3 The site is approximately 4.6 hectares in size and is located within the Great West Corridor Opportunity Area. It is bounded by Syon Lane to the south; MacFarlane Lane and two storey residential properties to the west; the Sky Campus to the north; and Grant Way to the east. The site comprises a two storey Tesco Extra superstore, a surface car park (614 car parking spaces), petrol filling station and car wash facility, together with a rectangular open space to the north which is known as the Water Gardens. The existing Tesco Extra store contains approximately 8,300 sq.m. (GIA) of retail floorspace.

4 The site itself is not designated or allocated for any use in the adopted Local Plan; however, Hounslow Council's Local Plan Review (2019) proposes that the site is allocated for residential and retail uses. In planning terms, the existing supermarket constitutes an out of centre retail use. It is approximately 1.5 kilometres from Brentford Town Centre and over 2 kilometres from Hounslow Town Centre, which are the closest town centres.

5 The site has a Public Transport Access Level (PTAL) of 2, on a scale of 0 to 6b where 6b is the highest. Syon Lane National Rail station is located approximately 650m south west of the site and is served by regular Southern Western Railway services to and from London Waterloo. Two different bus routes serve the site. Route H91 provides east-west connection along the A4 Great West Road between West Hounslow and Hammersmith with up to 6 buses per hour in each direction. The H28 which provides local connection from a terminating bus stop within the site boundary and Hounslow East and Bulls Bridge roundabout in Hayes and is served by 3 buses per hour during the day.

Surrounding context

6 The Sky Campus to the north comprises a 14 hectare hub of broadcasting, television and media production activities which is accessed from Grant Way via a controlled gated entrance. The campus falls with the Great West Road Strategic Industrial Location (SIL) which extends to include adjacent industrial premises on Harlequin Avenue, Shield Drive and along the Great West Road. A sports ground is located to the west of the site which includes playing fields, artificial grass pitches and a club house building. This open space is designated as Metropolitan Open Land (MOL) which extends further west towards Osterley Park.

7 Residential properties are found to the south and west of the site, which are predominantly two and three storey suburban semi-detached houses. The Boulder Academy is proposed to relocate from its existing site on London Road to a new purpose built school building on MacFarlane Lane to the north-west of the site. This new facility is expected to open in 2021, following Hounslow Council's decision to resolve to grant planning permission (LPA Ref: 01106/W/P9; GA ref: 4192).

8 There are a number of designated heritage assets both within close proximity to the site and in the wider surrounding area, with the A4 Great West Road home to a number of Art Deco buildings. The Gillette factory was built in 1937 and is Grade II listed, as are the lamp stands, lanterns and telephone kiosk outside the front entrance. It is buffered from the site a tree lined green link which runs parallel to Grant Way. Syon Clinic, Westlink House, 911 Great West Road and the former National Westminster Bank building are also all Grade II listed. The Pavilion and Clubhouse to the west are Grade II listed.

10 The wider surrounding context also includes a number of designated heritage assets and landscape areas. To the west is Osterley Park, a Registered Historic Park and Garden and is covered by the Osterley Park Conservation Area, which includes the Grade I listed Osterley House. Similarly, Syon Park to the south is a registered Historic Park and Garden and falls within the Isleworth Riverside Conservation Area, which includes the Grade I listed Syon House. The Royal Botanic Gardens World Heritage Site is found further to the south-west on the other side of the River Thames. This stretch of the River Thames is also covered by the Hampton to Wandsworth Thames Policy Area. To the north-west, Boston Manor Park falls within the Grand Union Canal and Boston Manor Conservation Area and includes the Grade I Listed Boston Manor House.

Details of the proposal

11 The pre-application proposals for the site envisage the demolition of the existing Tesco store and its redevelopment to provide approximately 1,650 residential units (35% affordable), with supporting commercial, employment and community floorspace in Class A1-A4, B1, D1 use, with building heights ranging from 4 to 16 storeys, together with associated public open space, landscaping, public realm, parking and highways works. The existing Water Gardens open space to the north would be retained, with a new 0.8 hectare linear park proposed which would create a diagonal desire line through the centre of the site, linking to the MOL. This would include a new civic square to the south on Grant Way. The existing roundabout which serves the Tesco Extra on Syon Lane is proposed to be removed. An illustrative concept of the proposed masterplan is shown below:

Figure 1 – illustrative masterplan



Background

12 The pre-application meeting and proposed development is linked with concurrent pre-application proposals for the redevelopment of the Homebase site on Syon Lane on the southern side of the A4 Great West Road for which a pre-application meeting also took place on 19 September and which is also being brought forwards by St Edward and Tesco in partnership. In combination, the proposals would see the existing Tesco Extra store relocated to the Homebase site as part of a mixed use residential development comprising approximately 10,700 sq.m. of retail floorspace and 500 residential units.

13 In terms of phasing, subject to planning permission being granted on both sites, the applicant would deliver the proposed replacement Tesco store on the Homebase site first. Once this development has been completed and the store is open, the existing Tesco Extra site would be redeveloped. The applicant has stated that they intend to submit an outline application for the Tesco site, with all matters reserved except access. A detailed planning application would be submitted for the redevelopment of the Homebase site given the phasing described above and the need to ensure continuity of trading for Tesco.

14 The proposed scheme would be referable to the Mayor under the following Categories of the Schedule to the Order 2008:

- *Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- *Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- *Category 1C: "Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London."*

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding strategic policies and guidance are as follows:

- Land use principles *London Plan; Town Centres SPG;*
- Housing and affordable housing *London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;*
- Historic environment *London Plan;*
- Inclusive access *London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Climate change *London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy;*

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hounslow Local Plan (2015) and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

17 The following are also relevant material considerations:

- the National Planning Policy Framework (2019);
- National Planning Practice Guidance;
- the Draft London Plan consolidated suggested changes version (July 2019) which should be taken into account on the basis explained in the NPPF;
- the Mayor's Affordable Housing & Viability SPG (2017) which must now be read in conjunction with the decision in *R v McCarthy & Stone*;
- Hounslow Council's Great West Corridor Local Plan Review (2019) – Regulation 19 public consultation (pre-submission version)

- Hounslow Council's Site Allocations Local Plan Review – Regulation 19 public consultation (pre-submission version)

Summary of pre-application meeting discussions

18 Following a presentation of the applicant's proposals for the site, meeting discussions covered strategic issues with respect to the principle of development, housing and affordable housing mix, play space, open space, urban design, townscape and heritage impact, residential quality and transport. Pre-application advice with respect to all of the main strategic issues discussed during the meeting is provided under the associated sections below.

Principle of development

Emerging Local Plan context

19 As noted above, whilst the site is not currently allocated for housing or designated for a particular use in the adopted Hounslow Local Plan (2015), it is put forward as a site allocation for residential and mixed use development as part of Hounslow Council's Local Plan Review (2019). The Council's draft allocation envisages two potential development scenarios: a minimum of 350 residential units is expected where the existing supermarket is retained on site; and a higher minimum expectation for 600 residential units would apply where it is possible to relocate the supermarket. This would contribute towards the Council's wider aspiration to deliver 7,500 residential units in the Great West Corridor between 2019 and 2034. The allocation also seeks a minimum of 780 sq.m. of retail (Class A1-A4) use, associated parking and enhanced public realm, including safeguarded unrestricted public access to the Water Gardens. It notes the need for any proposed development to incorporate agent of change principles, given the adjacent SIL and carefully consider heritage impacts.

Opportunity Area context

20 As set out above, the site is within the Great West Corridor Opportunity Area set out in the draft London Plan, having been indicatively identified as having potential for opportunity area status in the 2016 London Plan. In line with London Plan Policy 2.13 and draft London Plan Policy SD1, the proposed development should optimise potential residential and non-residential development capacity, provide an appropriate mix of uses and support wider regeneration and the provision of mixed and inclusive communities, whilst also recognising the role of heritage in place making. The draft London Plan sets the Opportunity Area an indicative capacity guideline for 7,500 homes and 14,000 jobs to 2041. The proposed development would respond positively to these broad policy objectives and would make a substantial contribution towards achieving the strategic planning aspirations in terms of housing delivery and place-making.

Housing supply

21 To meet housing targets, London Plan Policy 3.3 emphasises the particular importance of mixed use redevelopment of surplus commercial capacity. The need for existing out of town retail parks, supermarkets and associated surface car parks to deliver housing intensification and make a substantial contribution towards meeting London's housing need is set out in Policies H1, SD7 and E9 of the draft London Plan. As such, the proposed scheme, which would make a substantial contribution to meeting local and strategic housing targets through the higher density, comprehensive redevelopment of a low density supermarket site and associated surface car park is strongly supported.

Commercial, community, leisure and employment use

22 The proposed mixed use scheme would include provision for up to 4,400 sq.m. of supporting commercial and community use. This would comprise a mix of small-scale retail, restaurant, pub and cafe units in Class A1-A4 use, together with D1 community and nursery uses, leisure/gym uses as well as B1 employment workspace. The latter is proposed to be located close to Sky Campus fronting Grant Way. A pavilion building is also proposed at the entrance square which could house events and help to activate the square and thereby increase potential synergies with the adjacent Sky Campus, which currently operates as a relatively insular and gated business park, with few nearby amenities available off-site for employees.

23 This overall land use strategy is strongly supported and would ensure an appropriate place making approach is followed, in line with the London Plan's expectation for an opportunity area site such as this, which is of a substantial size. The quantum of non-residential floorspace would be of a broadly commensurate scale, given the residential density proposed and need to encourage sustainable patterns of movement, in view of the site's proximity to nearby town centres amenities. Compared to the existing situation there would appear be a substantial net reduction in commercial floorspace on site. This is supported taking into account the site's out of centre location and the town centre first approach set out in the London Plan and draft London Plan. As such, GLA officers consider that, in this instance, an impact assessment and sequential test is not required.

Conclusion - Principle of development

24 To conclude, the principle of the comprehensive residential-led mixed use redevelopment of this out of town supermarket site within an opportunity area strongly accords with the land use principles set out in the London Plan and draft London Plan, as well as the expectations set out in Hounslow Council's Local Plan Review.

Housing and affordable housing

Affordable housing and viability

25 The applicant has stated that the proposed development would provide approximately 1,650 residential units, of which 35% would be affordable on a habitable room basis, in accordance with the 'Fast Track Route' criteria set out in Policy H6 of the draft London Plan. This is strongly supported. As set out during the meeting, GLA officers can confirm that this site would be subject to the 35% minimum threshold for affordable housing.

26 For any future application to follow the 'Fast Track Route', the criteria set out in Policy H6C must be complied with. This requires a policy compliant tenure split proposed and for the baseline level of affordable housing to be secured, without public subsidy. To be eligible for the 'Fast Track Approach' the applicant must have sought grant to increase the level of affordable housing beyond 35%, taking into account the Mayor's strategic 50% target for affordable housing. This should be demonstrated through evidenced discussions between the applicant and Registered Providers and the local authority. Early engagement with Registered Providers is therefore required. An Early Stage Review Mechanism would also be required, the precise details of which should be agreed with the Council in consultation with the GLA, taking into account site specific issues and the phased and linked nature of the proposed development.

Tenure mix

27 Policy H7 of the draft London Plan and the Affordable Housing and Viability SPG sets out the Mayor's minimum expectations in terms of tenure split for all residential development. This requires that at least 30% of affordable housing should comprise low cost rent (either London

Affordable Rent or social rent) and at least 30% intermediate, with the remaining 40% to be determined by the borough.

28 GLA officers note that the adopted Hounslow Local Plan (2015) requires 40% affordable housing, with a 60/40 split between affordable/social rent and intermediate housing; whereas, Policy GWC2 of the Council's draft Great West Corridor applies the Fast Track Route / threshold approach set out in the draft London Plan and states that the Council will seek a 70/30 split between London Affordable Rent and/or social rent and 30% intermediate. The applicant's proposed tenure mix has not yet been confirmed and this should be subject to further discussion between the applicant, Council and GLA to ensure that the tenure mix requirements in this instance and the scheme's potential eligibility for the 'Fast Track Route' can be confirmed, prior to submission of any application.

Housing affordability

29 The draft London Plan sets out the Mayor's preferred affordable housing tenures, which includes social rent/London Affordable Rent; London Living Rent and London Shared Ownership. Further discussion is required to clarify the proposed housing tenures and affordability levels and enable GLA officers to assess how this relates to the Mayor's preferred affordable housing tenures and relevant affordability tests set out in the draft London Plan.

30 With regards to the low cost rented units, the draft London Plan is clear that these should be substantially below the NPPF definition, and respond positively to the Mayor's benchmarks¹, for London Affordable Rent and traditional social rent levels. For the avoidance of doubt, rents at 80% of market rent are unacceptable. Potential service charges on LAR units should also be fully considered and subject to appropriate caps to ensure the overall affordability of the proposed low cost rent units.

31 Shared ownership units should be available to households on a range of incomes below the maximum income threshold set out in the draft London Plan (£90,000 a year). Any intermediate rent units such as London Living Rent and Discount Market Rent units should be affordable on incomes up to £60,000 a year. In addition to this, annual housing costs (including service charges, rent and any interest payment) for any intermediate units should be no greater than 40% of net household income.

Housing mix

32 London Plan Policy 3.8 states that new development should provide a mix of housing sizes and types, taking into account local and strategic housing requirements, the needs of different groups, the strategic priority for affordable family housing provision and the need to support the private rented sector. Policy H12 of the draft London Plan states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need and demand, the nature and location of a site, the requirement to optimise housing potential and deliver mixed and inclusive neighbourhoods. Policy H12 advises boroughs not to set prescriptive dwelling size mix requirements for market and intermediate homes. The applicant's proposed unit size mix should be confirmed and subject to further discussion, taking into account the considerations set out above.

¹ Mayor of London, 2016, Affordable Homes Programme 2016-21 Funding Guide
<https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programme-2016-21>

Children's play space

33 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the draft London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement.

34 The GLA published an updated play space calculator in June 2019), which is available here and should be used to assess provision:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/play-and-informal-recreation>

Inclusive design

35 As set out in London Plan Policy 3.8 and Policy D5 of the draft London Plan, all the new self-contained homes should meet the Building Regulations M4(2) standard for 'accessible and adaptable dwellings', with at least 10% of homes designed to meet the M4(3) standard for 'wheelchair user dwellings'. The latter should generally be distributed across tenures types, flat sizes and floors to give disabled and older people similar choices to non-disabled people. The public realm should achieve the highest standards of inclusive design, which will need to be demonstrated within the application documents.

Urban design

Density and design review

36 London Plan Policy 3.4 seeks to optimise housing capacity, with Policies D1, D1B and D2 of the draft London Plan placing greater emphasis on a design-led approach being undertaken to ensure development makes the best use of land, taking into account site context, public transport, walking and cycling accessibility and infrastructure capacity. Overall, whilst noting the site's location and PTAL as well as the surrounding heritage and suburban context, GLA officers consider that the site is suitable for a well-designed high density scheme, taking into account its substantial size (4.5 hectares) within an opportunity area and the relatively unconstrained nature of the immediate context to the north. The success of any high density residential scheme will, however, depend on the potential to significantly improve the existing walking, cycling and public transport connections and address highways severance issues in what is a relatively car dominated junction on the A4 Great West Road.

37 The draft London Plan promotes the use of a design review process to ensure that proposals for higher density development and tall buildings are subject to additional design scrutiny and to ensure good design. Whilst the density and exact height of the proposed development has not been confirmed, GLA officers consider it is likely that the proposals would trigger the thresholds for a design review which are set out in Policy D2 of the draft London Plan and recommend that the scheme is subject to a local design review at an appropriate early stage. GLA officers understand that design reviews are planned for both the Tesco and Homebase schemes, which is welcomed.

Design, layout, public realm and landscaping

38 London Plan Policies 7.1 to 7.5, together with Policies D1-D3, D7 of the draft London Plan and the Housing SPG (2016) apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes, the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages.

39 Key features of the masterplan and the underlying urban design rational is supported and accords with these objectives, which is welcomed. A clear network of streets, blocks and public spaces is proposed which would be structured around a central 0.8 hectare linear park. This would run diagonally through the site and open up a clear and logical desire line through to the MOL and towards Syon Lane Station, as well as providing potential glimpsed views of the Gillette Tower to contribute to legibility and overall place-making.

40 The initial designs for the linear park show that this space would be well-fronted by adjacent residential blocks and orientated to ensure good access to daylight and sunlight. The park would comprise a multifunctional continuous green space (27m x 200m in its dimensions), including play space, open water and SuDs and planting areas. A more urban civic square is proposed at the southern entrance of the linear park, which seeks to form a stronger relationship with the Sky Campus to the north. This would be framed by marker buildings with employment, retail and south facing restaurant/cafe/bar uses at ground floor level and a stand-alone pavilion building, which could hold events and would help to animate this space. This overall approach is strongly supported. Proposals to retain and enhance the Water Gardens are welcomed, as this would help to buffer the site from the Sky Campus to the north which is SIL and subject to the Agent of Change principle, as set out in Policy E5 of the draft London Plan. Further design details should be provided on this interface given the above requirements and presence of north-facing residential elevations.

41 Residential parking provision would be generally accommodated under podium level courtyard amenity spaces and appears to be wrapped by residential units at ground floor level, which is welcomed. Limited on-street parking provided on local side streets to help contribute to the residential character and function of these routes and street level activity, which is also supported. Maisonettes/ duplex apartments with their own front door entrances and private set backs facing onto the street are encouraged along these routes and where residential units are proposed on the ground floor facing the linear park and MOL.

Residential quality

42 London Plan Policy 3.5 and draft London Plan Policy D4 promote quality in new housing provision, with further standards and guidance set out in the Mayor's Housing SPG (2016). In accordance with this strategic priority, it is essential that residential quality is embraced fully, and baseline standards exceeded wherever possible, especially for high density residential developments of this nature.

43 Whilst GLA officers note the outline nature of the proposed development, the applicant is advised that the sufficient clarity will be required in any future planning application and any supporting design code document to demonstrate how the detailed design of the scheme will comply with the requirements of the above policies and guidance. In particular, compliance with minimum standards for internal and private amenity space and the overall objective to maximise dual aspect units and minimise single aspect units (whilst generally avoiding north facing single aspect units), together with general compliance with the Housing SPG benchmark ratio for units per core per floor. Blocks are off-set to align with the layout of the diagonal linear park. This would appear to potentially avoid the potential for any directly north facing single aspect units; however, this will need to be confirmed by the applicant, particularly where blocks front the Water

Gardens to the north. Air quality and road based noise pollution levels will need to be appropriately mitigated.

Height and massing

44 The overall massing strategy is well-considered and has been refined appropriately in response to the opportunities and constraints presented by the site's redevelopment. A staggered and varied massing is proposed both across the entire site but also within the individual blocks which is supported. This would ensure that the development is appropriately stepped down towards the more suburban context on Syon Lane and with the tallest 15 and 16 elements within the scheme located centrally and towards the north of the site, so as to reduce the potential impact on the Grade II Listed Gillette Building. The undulating massing of development fronting the linear park is welcomed, with taller elements located on street and block corners and the massing also lowered to 7 and 8 storey buildings in order to improve daylight and sunlight penetration into this important public space and also within courtyard spaces within residential blocks. Whilst the minimum distances across the Linear Park and courtyard appear reasonable given the height and massing proposed, further illustrative cross-sections of the proposed public spaces, streets and internal courtyards should be provided for assessment, together with a daylight and sunlight assessment. Options to further refine the massing of the taller elements of the scheme – 16 and 15 storey blocks – should be developed as the scheme is progressed. This should seek to ensure the scheme makes the optimal contribution to the skyline of the area, which is characterised in part by distinctive, relatively slender taller structures and building features.

Heritage

45 Policy SD1 of the draft London Plan recognises the role of heritage in place making within opportunity areas. Paragraph 2.1.64A recognises the need to respond positively to and enhance the particularly distinctive Art Deco architecture along the Great West Corridor Opportunity Area and for the potential visual impact of development on surrounding historic landscapes including the River Thames to be fully considered where large-scale development is proposed in the area.

46 Based on the initial wireline views provided and subject to fuller assessment of verified rendered views submitted as part of any future planning application, GLA officers consider the impact of the proposed development on the setting of the Grade II listed Gillette building to be acceptable. Views from the junction of Syon Lane and the Great West Road demonstrate that buildings would be generally read at shoulder height in relation to the Gillette building given the distance to the site and staggered massing of the scheme and would not visually dominate the profile and setting of the slender clock tower. Longer distance views from Syon Lane station to the south do, however, show that one of the taller marker blocks would be visible behind the lower section of the clock tower. Accordingly, the massing and materials approach for this building should be considered carefully to ensure a sympathetic and recessive approach is followed.

47 Wireline views from Syon Park, Osterley Park, Boston Manor Park and the Royal Botanical Gardens World Heritage Site have been provided, which have been taken from these locations during an appropriate time of year and demonstrate that there is very limited potential for visual impact on these heritage assets given the distance involved and existing landscape features.

48 Notwithstanding this, a Townscape and Heritage Visual Impact Assessment (THVIA) is required to support the proposals, which will need to consider the impact on the designated heritage assets set out above, taking into account cumulative impacts of the proposed development on the Homepage site. Any harm to the setting of heritage assets would need to be weighed against the public benefits of the development, particularly the delivery of additional affordable housing.

Energy

49 Whilst not discussed in detail at the meeting, a short two page note on the energy strategy has been provided which outlines a number of options the applicant is considering in terms of energy efficiency, decentralised energy/heat network and renewable energy. Further pre-application discussion and advice from GLA officers can be provided at an appropriate stage, once the energy strategy has been further developed.

Sustainable urban Drainage

50 The proposed developments should aim to achieve greenfield run-off rates by maximising the use of above ground Sustainable Urban Drainage Systems (SuDS) in line with London Plan Policy 5.13 and Policy SI12 of the draft London Plan. Evidence will need to be provided of how this is achieved for a variety of return periods up to and including the 1 in 100-year event, with an allowance for climate change (40%). If a greenfield run-off rate is not achievable, the applicant will need to justify why this is not possible and demonstrate that the use of above ground sustainable drainage systems (SuDS) has been maximised, in line with the London Plan drainage hierarchy. SuDS are proposed along the linear park, which is welcomed and should form an integral part of the design of this space and other landscaped spaces adjacent to Syon Lane and Grant Way.

Urban Greening

51 An Urban Greening Factor assessment should be provided, demonstrating how the scheme complies with the 0.4 target set out in Policy G5 of the draft London Plan. Landscape design plays an important role in overall design of the proposed scheme, with the site bordering a range of conditions including a major road to the south and Metropolitan Open Land to the north.

Transport

Car Parking

52 Residential car parking is proposed to be provided at a ratio of 0.25 spaces per unit. This accords with the London Plan and draft London Plan and is acceptable. The draft London Plan also requires that disabled person parking should be provided for three per cent of dwellings from the outset, with up to ten per cent provided if the demand arises. The transport assessment must clarify the non-residential parking provision, disabled parking provision and provide details of the allocation for each of the proposed uses (residential and non-residential). The proposal should include 20% active Electric Vehicle Charging Points (EVCP), with passive provision for the remaining 80%.

Cycle parking

53 Cycle parking is proposed to be provided in accordance with draft London plan standards for all of the proposed land uses, which is welcomed. Cycle parking should be designed in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS). Further information is required to confirm the location, floor and size of cycle parking facilities serving residential accommodation and the access routes for residents using these facilities. Visitor cycle parking should be located close to the main entrances of the buildings they serve. There should be consideration how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Walking and cycling

54 The proposed redevelopment of the site will see an increase in pedestrian and cycle trips to and from the site and the local area. The applicant is proposing to improve pedestrian and cycle connections to the Homebase site and Syon Lane rail station; however, no specific details have been provided to set out what these improvements might entail. TfL are developing a scheme to address road safety and improve pedestrian and cycle facilities at Gillette Corner. This includes decommissioning the existing subway and introducing at grade crossings for pedestrians and cyclists. Given that the proposed development will increase pedestrian and cycle movements at Gillette Corner, a financial contribution towards these works will be required to mitigate the impact of the development, in accordance with London Plan Policies 6.3, 6.9, 6.10 and Policies T1-T5 of the draft London Plan. Proposals to remove/remodel the existing roundabout on Syon Lane and provide a T-junction are encouraged, given the potential for this to enhance pedestrian and cycle access and reduce the dominance of moving vehicles.

Transport Assessment

55 The Transport Assessment (TA) should be produced, in accordance with the latest TfL guidance on Transport Assessments². The TA will need to cover all relevant site specific transport issues, including but not limited to a multi-modal trip generation analysis and an assessment of the impacts of the development on highway, public transport capacity, details of the proposed access for all modes, car parking, cycle parking, delivery and servicing strategy, the provisions for mitigating the impacts of construction traffic, and the proposed interventions to address any potential adverse transport impacts.

Healthy Streets and Active Travel

56 The applicant is required to ensure that the Healthy Streets approach is considered both throughout the site and within the local area. TfL also expect the applicant to submit an Active Travel Zone Assessment (ATZ) as part of the application submission. This assessment will cover the key routes in the wider area, including routes to the nearest rail stations, bus stops, parks and amenities and should identify deficiencies of these routes and scope for enhancing these routes. Guidance on Healthy Streets can be found here: <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>.

Public Transport impact and mitigation

57 Bus trip generation figures by time and direction should be provided within the TA, with the peak hour indicated separately, to allow the cumulative impact of the proposed development on bus capacity to be identified, taking into account existing capacity, and to confirm whether any mitigation is required in terms of financial contributions. A minimum of two bus stands and a bus driver facility for bus routes terminating on site should be provided. The location and design of these facilities should be the subject of further pre-application discussions with TfL.

Vision Zero

58 The Mayor's Vision Zero ambition is the elimination of all deaths and serious injuries from London's streets by 2041. The Vision Zero approach requires reducing the dominance of motor vehicles and creating streets safe for active travel. The TA should identify measures which can be used to eliminate recorded accidents and should demonstrate how the scheme will contribute towards the Vision Zero approach.

² <https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants>

Deliveries and servicing

59 The TA is required to present the trip generation analysis for servicing and delivery vehicles and demonstrate that the proposed loading bays are adequate to meet the needs of the development. The application must be accompanied by a Delivery and Servicing Plan (DSP) that sets out the arrangements for all elements of the proposed development and supported by swept path analysis, as appropriate. Care should be taken to position the loading bays in locations where they will not conflict with pedestrians and cyclists and that visibility splays are not affected.

Construction

60 The application must be accompanied by a Construction and Logistics Plan (CLP) that details construction programme, routes for HGVs; frequency of deliveries and loading/unloading locations. Full details of what should be provided within the CLP, can be found here: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/freight>.

Travel Planning

61 A framework travel plan covering all elements of the development, which sets out the targets and the measures to be implemented, will need to be submitted as part of the application. TfL expects that the full travel plan will be secured and monitored as part of a Section 106 Agreement. The travel plan/s should be in line with TfL's Travel Planning Guidance, available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

Conclusion

62 The proposed comprehensive residential led mixed use redevelopment of this out of town supermarket site and car park is strongly supported. The affordable housing offer is Fast Track eligible, subject to the applicant fully exploring the potential for grant funding to provide additional affordable housing within the scheme and further discussion and agreement on the tenure split and affordability levels proposed. Key features of the proposed masterplan and the underlying urban design rationale including, in particular, the proposal for a 0.8 hectare linear park is strongly supported. The proposed density, layout, design and massing of the scheme is supported, subject to further information being provided in relation to residential quality, as well as townscape, heritage and visual impact, together with improvements to the walking and cycling network being secured. The applicant is encouraged to undertake a design review. Further information should be provided on play space requirements and on-site provision.

63 Notwithstanding this, the success of any high density residential scheme will, however, depend and public transport connections and address highways severance issues in what is a relatively car dominated location adjacent to the A4 Great West Road. The development must contribute to TfL's emerging scheme to improve road safety and pedestrian and cycle facilities at Gillette Corner given the importance of this route to the station and increase in pedestrian and cycle trips expected. Subject to the TA and agreement of trip generation figures, financial contributions towards bus capacity improvements may be required.

for further information, contact GLA Planning Unit (Development Management Team):

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]
[REDACTED]
[REDACTED]

Development, Enterprise and Environment

[REDACTED]
Indigo Planning
Aldermay House
10 – 15 Queen Street
London, EC4N 1TX

Our ref: GLA/5242/01/ADR
Date: 16 December 2019

Dear [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Homebase, Syon Lane, Osterley, London Borough of Hounslow
Our reference: GLA/5244

Further to the pre-planning application meeting held on 19 September 2019, I enclose a copy of the GLA's updated pre-application assessment (pre-application report GLA/5242/01) which sets out our advice and matters which will need to be fully addressed by any future application.

The pre-application report has been updated to reflect the additional information provided and the additional content you have requested for inclusion. The key changes are summarised below:

- Retail floorspace figures amended in Table 1.
- Standard pre-application energy advice included.
- Reference to the updated GLA play space calculator (23 October 2019), which provided updated age categories.
- Paragraph 28 is amended to clarify that the details of the proposed affordable housing tenure split have been provided, as set out in paragraph 25.
- The section on retail car parking has been amended taking into account the additional note on parking provided by your transport consultants. This follows further discussion internally on how parking standards should be applied by floorspace / Gross Internal Area.
- The conclusion has been updated, taking into account the changes made to the body of the report.

I trust that this has addressed the points which you have raised with my officers. This updated pre-application report, supersedes the original report issued on 21 October 2019.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,

A handwritten signature in blue ink, reading "John Finlayson", with a long horizontal flourish extending to the right.

John Finlayson
Head of Development Management

cc Lucinda Turner, TfL
[redacted] – St Edward
[redacted] – Tesco

16 December 2019

Homebase, Syon Lane, Osterley

in the London Borough of Hounslow

The proposal

Mixed use development comprising over 500 residential units and approximately 10,700 sq.m. of retail floorspace, including a new Tesco store.

The applicant

The applicant is **Berkeley St Edward** and the architect is **Patel Taylor**

Context

1 A request was received in July 2019 for a pre-planning application meeting with the Greater London Authority (GLA) to discuss a proposal to develop the above site for the above uses. On 19 September 2019, a formal pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- [REDACTED], Principal Strategic Planner, GLA (case officer)
- [REDACTED] – Team Leader, GLA
- [REDACTED] – Team Leader, Urban Design, GLA
- [REDACTED] Assistant Planner, GLA
- [REDACTED] – Principal Planner, Transport for London (TfL)

Applicant team

- [REDACTED] – Berkeley St Edward
- [REDACTED] Berkeley St Edward
- [REDACTED] – Berkeley St Edward
- [REDACTED] – Tesco
- [REDACTED] – WSP | Indigo Planning
- [REDACTED] – Patel Taylor
- [REDACTED] – Patel Taylor
- [REDACTED] – ARC
- [REDACTED] – KM Heritage
- [REDACTED] – RDHV
- [REDACTED] – Murdoch Wickham

Local planning authority

- [REDACTED] – Hounslow Council
- [REDACTED] Hounslow Council

2 The advice given by officers does not constitute a formal response or decision by the Mayor regarding future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

3 It is noted that a TfL pre-application meeting and follow up meeting were held in May and August of this year; these comments should be read in conjunction with the TfL pre-application advice letters.

Site description

4 The site is approximately 1.8 hectares in size and is located within the Great West Corridor Opportunity Area. It is bounded by Syon Lane to the west; the A4 Great West Road to the north; a railway line and tree corridor to the south; and a car show room to the east. The site comprises a 4,180 sq.m. Homesbase retail warehouse building, together with 295 surface car parking spaces which rap around the front and side of the building to the north and west. A loading and delivery area is located to the rear of the building, alongside a garden centre. Vehicle site access is on Syon Lane. Whilst the Homebase store continues to trade, it has been earmarked for closure and has terminated its long-term lease.

5 The site itself is not designated or allocated for any use in the adopted Local Plan; however, Hounslow Council's Local Plan Review (2019) proposes that the site is allocated for residential, retail and B1 employment uses. In planning terms, the existing retail warehouse store constitutes an out of centre retail use. It is approximately 1.5 kilometres from Brentford Town Centre and over 2 kilometres from Hounslow Town Centre, which are the closest town centres.

6 The site has a Public Transport Access Level (PTAL) of 2 and 3, on a scale of 0 to 6b where 6b is the highest. Syon Lane National Rail station is located on the other side of Syon Lane, which can be accessed via a signalled pedestrian crossing. This station is served by regular Southern Western Railway services to and from London Waterloo. Two different bus routes serve the site. Route H91 provides east-west connection along the A4 Great West Road between West Hounslow and Hammersmith with up to 6 buses per hour in each direction. The H28 which provides local service towards Hounslow East and Bulls Bridge roundabout in Hayes, which is served by 3 buses per hour during the day. Bus stops are available directly outside the site.

7 The site is not within a conservation area and does not include any Statutory listed buildings. As discussed during the meeting, the existing Homebase building was designed by Sir Nicholas Grimshaw and features a 33 metre tall metallic tower structure which holds up the column free roof. The building is subject to a current listing application which has been submitted to the Department of Culture Media and Sport (DCMS). The applicant has submitted an application for Certificate of Immunity from Listing, under Section 6 of the Listed Buildings and Conservation Area Act 1990. These applications are ongoing and have not yet been determined.

Surrounding context

8 In terms of the surrounding context, the area to the south and west is residential and comprises two and three storey suburban properties. The Hounslow Local Plan (2016) identifies the streets off Northumberland Avenue to the west as an 'Area of Special Character'. Planning permission has been granted for a six storey building in B1 office and B8 self-storage use on the facing corner site on Syon Lane/the A4 Great West Road. To the north, the Sky Campus comprises a 14 hectare hub of broadcasting, television and media production activities which is accessed from Grant Way via a controlled gated entrance and falls within the wider Great West Road Strategic Industrial Location (SIL). This extends to cover the Gillett Building and industrial properties to the north of the Great West Road and along the southern side, to the west of Westlink House.

9 There are a number of designated heritage assets both within close proximity to the site and in the wider surrounding area, with the A4 Great West Road home to a number of Art Deco buildings. The Gillette factory was built in 1937 and is Grade II listed, as are the lamp stands, lanterns and telephone kiosk outside the front entrance. The former National Westminster Bank is also Grade II listed. To the east, the Syon Clinic, Westlink House and 911 Great West Road are Grade II listed.

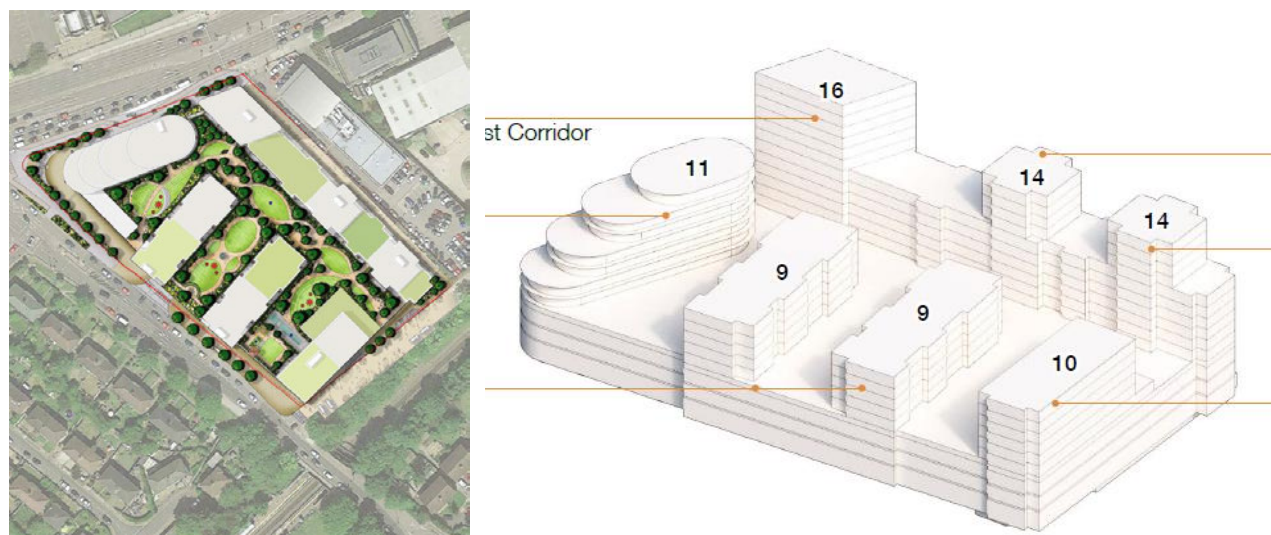
10 The wider surrounding context also includes a number of designated heritage assets and landscape areas. To the west is Osterley Park, a Registered Historic Park and Garden and is covered by the Osterley Park Conservation Area, which includes the Grade I listed Osterley House. Similarly, Syon Park to the south is a registered Historic Park and Garden and falls within the Isleworth Riverside Conservation Area, which includes the Grade I listed Syon House. The Royal Botanic Gardens World Heritage Site is found further to the south-west on the other side of the River Thames. This stretch of the River Thames is also covered by the Hampton to Wandsworth Thames Policy Area. To the north-west, Boston Manor Park falls within the Grand Union Canal and Boston Manor Conservation Area and includes the Grade I Listed Boston Manor House.

Details of the proposal

11 The pre-application proposals envisage the comprehensive mixed use development for the site to provide over 500 residential units and approximately 10,700 sq.m. of retail floorspace. A new Tesco store would be provided at ground floor level fronting the Great West Road with servicing and back of house uses located to the rear and eastern site boundary. The Tesco store would be served by 400 customer car parking spaces, which would be located within a two storey internal car park which would sit above the Tesco store. The existing vehicle access on Syon Lane would be retained, with a ramp access route provided to the raised car park, which would also include residential car parking and cycle parking.

12 Residential accommodation would be provided on the upper floors within five blocks with raised open communal amenity space provided at podium level (above the car park), rising from 8 to 16 storeys, with the taller elements located adjacent to the site's eastern boundary. A small unit in community use is proposed on the second floor overlooking the junction corner at Syon Lane and Great West Road. In addition, a small retail unit is also proposed on Syon Lane. Vehicle access would be provided via the existing site access on Syon Lane. Public realm and landscaping improvements are proposed along Syon Lane and the Great West Road. The illustrative layout, height and massing is shown below.

Figure 1 – illustrative masterplan



Background

13 The pre-application meeting and proposed development is linked with concurrent pre-application proposals for the redevelopment of the Tesco site on Syon Lane on the norther side of the A4 Great West Road for which a pre-application meeting also took place on 5 September 2019 and which is also being brought forwards by St Edward and Tesco in partnership. In combination, the proposals would see the existing Tesco Extra store relocated to the Homebase site. In terms of phasing, subject to planning permission being granted on both sites, the applicant would deliver the proposed replacement Tesco store on the Homebase site first. Once this development has been completed and the store is open, the existing Tesco Extra site would be redeveloped. A detailed planning application would be submitted for the redevelopment of the Homebase site given the phasing described above and the need to ensure continuity of trading for Tesco.

14 The proposed scheme would be referable to the Mayor under the following Categories of the Schedule to the Order 2008:

- *Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- *Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- *Category 1C: "Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London."*

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding strategic policies and guidance are as follows:

- Land use principles *London Plan; Town Centres SPG;*
- Housing and affordable housing *London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;*
- Historic environment *London Plan;*
- Inclusive access *London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Climate change *London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy;*

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hounslow Local Plan (2015) and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

17 The following are also relevant material considerations:

- the National Planning Policy Framework (2019);
- National Planning Practice Guidance;
- the Draft London Plan consolidated suggested changes version (July 2019) which should be taken into account on the basis explained in the NPPF;

- the Mayor's Affordable Housing & Viability SPG (2017) which must now be read in conjunction with the decision in R v McCarthy & Stone;
- Hounslow Council's Great West Corridor Local Plan Review (2019) – Regulation 19 public consultation (pre-submission version)
- Hounslow Council's Site Allocations Local Plan Review – Regulation 19 public consultation (pre-submission version)

Summary of pre-application meeting discussions

18 Following a presentation of the applicant's proposals for the site, meeting discussions covered strategic issues with respect to the principle of development, housing and affordable housing mix, play space, open space, urban design, residential quality, townscape and heritage impact and transport. Pre-application advice with respect to all of these strategic issues discussed during the meeting is provided under the associated sections below.

Principle of development

Emerging Local Plan context

19 As noted above, whilst the site is not currently allocated for housing or designated for a particular use in the adopted Hounslow Local Plan (2015), it is put forward as a site allocation for residential and mixed use development as part of Hounslow Council's Local Plan Review (2019). The Council's draft allocation envisages a mix of residential, retail and office uses, including scope for a single large format retail store and a minimum of 340 homes. This would contribute towards the Council's wider aspiration to deliver 7,500 residential units in the Great West Corridor between 2019 and 2034.

Opportunity Area context

20 As set out above, the site is within the Great West Corridor Opportunity Area set out in the draft London Plan, having been indicatively identified as having potential for opportunity area status in the 2016 London Plan. In line with London Plan Policy 2.13 and draft London Plan Policy SD1, the proposed development should optimise potential residential and non-residential development capacity, provide an appropriate mix of uses and support wider regeneration and the provision of mixed and inclusive communities, whilst also recognising the role of heritage in place making. The draft London Plan sets the Opportunity Area an indicative capacity guideline for 7,500 homes and 14,000 jobs to 2041. The proposed development would respond positively to these broad policy objectives and would make a substantial contribution towards achieving the strategic planning aspirations in terms of housing delivery and place-making.

Housing supply

21 To meet housing targets, London Plan Policy 3.3 emphasises the particular importance of mixed use redevelopment of surplus commercial capacity. The need for existing out of town retail parks and associated surface car parks to deliver housing intensification and make a substantial contribution towards meeting London's housing need is set out in Policies H1, SD7 and E9 of the draft London Plan. As such, the proposed scheme which would make a significant contribution to meeting local and strategic housing targets through the higher density, comprehensive redevelopment of a low density out of town retail warehouse site and associated surface car park is strongly supported.

Retail floorspace

22 The scheme proposes more than double the quantum of existing retail floorspace on site. Under normal circumstances, this would typically require further justification in terms of an impact assessment and sequential test given the site's out of centre location. However, in this instance, the proposals would involve the relocation of the existing Tesco store, with the replacement store provided on this site, which would be slightly smaller than the existing supermarket. Overall, there would be a significant net reduction in terms of retail floorspace, as shown below in Figure 1. As such, the proposals are acceptable in terms of London Plan Policy 4.7 and Policy SD8.

Table 1 – existing and proposed retail floorspace (sq.m.)

| | Existing | Proposed | Net change |
|---------------------|-----------------|-----------------|-------------------|
| Homebase site | 4,180 | 10,500 | + 6,320 |
| Tesco site | 11,800 | 3,000 | - 8,800 |
| Total retail | 15,980 | 13,500 | -2,480 |

Commercial floorspace

23 Proposals for a small-scale community room and 200 sq.m. commercial unit are supported. Further details are required to confirm how the community space would be accessed and set out its intended function and use.

Conclusion - Principle of development

24 To conclude, the principle of the comprehensive residential and mixed use redevelopment of this out of town retail park site within an opportunity area strongly accords with the land use principles set out in the London Plan and draft London Plan and the broad objectives for the site which are set out in the Council's Local Plan Review.

Housing and affordable housing

Affordable housing and viability

25 The applicant has stated that the proposed development would provide 35% affordable housing on a habitable room basis, which would comprise a 60:40 split between low cost rented housing (social rent/London Affordable Rent) and intermediate housing provision, in accordance with the 'Fast Track Route' criteria set out in Policy H6 of the draft London Plan. This is strongly supported. As set out during the meeting, GLA officers can confirm that this site would be subject to the 35% minimum threshold for affordable housing.

26 For any future application to follow the 'Fast Track Route', the criteria set out in Policy H6C must be complied with. This requires a policy compliant tenure split proposed and for the baseline level of affordable housing to be secured, without public subsidy. To be eligible for the 'Fast Track Approach' the applicant must have sought grant to increase the level of affordable housing beyond 35%, taking into account the Mayor's strategic 50% target for affordable housing. This should be demonstrated through evidenced discussions between the applicant and Registered Providers and the local authority. Early engagement with Registered Providers is therefore required. An Early Stage Review Mechanism would also be required, the precise details of which should be agreed with the Council in consultation with the GLA, taking into account site specific issues and the phased and linked nature of the proposed development.

Tenure mix

27 Policy H7 of the draft London Plan and the Affordable Housing and Viability SPG sets out the Mayor's minimum expectations in terms of tenure split for all residential development. This requires that at least 30% of affordable housing should comprise low cost rent (either London Affordable Rent or social rent) and at least 30% intermediate, with the remaining 40% to be determined by the borough.

28 GLA officers note that the adopted Hounslow Local Plan (2015) requires 40% affordable housing, with a 60/40 split between affordable/social rent and intermediate housing; whereas, Policy GWC2 of the Council's draft Great West Corridor applies the Fast Track Route / threshold approach set out in the draft London Plan and states that the Council will seek a 70/30 split between London Affordable Rent and/or social rent and 30% intermediate. Taking into account the existing and emerging local policy context, GLA officers would welcome further discussion between the applicant, Council and GLA to confirm the scheme's potential eligibility for the 'Fast Track Route' prior to the submission of any application.

Housing affordability

29 The draft London Plan sets out the Mayor's preferred affordable housing tenures, which includes social rent/London Affordable Rent; London Living Rent and London Shared Ownership. Further discussion is required to clarify the proposed housing tenures and affordability levels and enable GLA officers to assess how this relates to the Mayor's preferred affordable housing tenures and relevant affordability tests set out in the draft London Plan.

30 With regards to the low cost rented units, the draft London Plan is clear that these should be substantially below the NPPF definition, and respond positively to the Mayor's benchmarks¹, for London Affordable Rent and traditional social rent levels. For the avoidance of doubt, rents at 80% of market rent are unacceptable. Potential service charges on LAR units should also be fully considered and subject to appropriate caps to ensure the overall affordability of the proposed low cost rent units.

31 Shared ownership units should be available to households on a range of incomes below the maximum income threshold set out in the draft London Plan (£90,000 a year). Any intermediate rent units such as London Living Rent and Discount Market Rent units should be affordable on incomes up to £60,000 a year. In addition to this, annual housing costs (including service charges, rent and any interest payment) for any intermediate units should be no greater than 40% of net household income.

Housing mix

32 London Plan Policy 3.8 states that new development should provide a mix of housing sizes and types, taking into account local and strategic housing requirements, the needs of different groups, the strategic priority for affordable family housing provision and the need to support the private rented sector. Policy H12 of the draft London Plan states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need and demand, the nature and location of a site, the requirement to optimise housing potential and deliver mixed and inclusive neighbourhoods. Policy H12 advises boroughs not to set prescriptive dwelling size mix requirements for market and intermediate homes. Whilst the applicant's proposed unit size mix would be weighted towards one and two bedroom units, 10% of the

¹ Mayor of London, 2016, Affordable Homes Programme 2016-21 Funding Guide
<https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programme-2016-21>

provision would be for family sized 3 bedroom units, with a higher 30% proportion proposed for the social rent element. This is supported, taking into account the policy framework set out above and the characteristics of the site, context and the proposed development.

Children's play space

33 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the draft London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement.

34 The GLA published an updated play space calculator in June 2019, which is available here: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/play-and-informal-recreation>

35 This updated play space calculator should be used to assess the requirement for play space provision within the scheme, with the proposed play space provision set out clearly on a play space strategy supporting the application. The calculator was updated on 23 October 2019 to provide age categories for play provision which are consistent with the SPG. The updated calculator should be used to assess provision.

36 The proposed approach to play space and landscaped outdoor amenity space comprises a series of linked courtyard gardens at podium level, which would be available to all residents, irrespective of tenure. These spaces would be relatively well screened from the adjacent busy roads by building elevations and would comprise a mix of lawns, natural play features and private gardens immediately adjacent to block edges. Overall, this approach is supported.

Inclusive design

37 As set out in London Plan Policy 3.8 and Policy D5 of the draft London Plan, all the new self-contained homes should meet the Building Regulations M4(2) standard for 'accessible and adaptable dwellings', with at least 10% of homes designed to meet the M4(3) standard for 'wheelchair user dwellings'. The latter should generally be distributed across tenures types, flat sizes and floors to give disabled and older people similar choices to non-disabled people. The public realm should achieve the highest standards of inclusive design, which will need to be demonstrated within the application documents.

Urban design

Density and design review

38 London Plan Policy 3.4 seeks to optimise housing capacity, with Policies D1, D1B and D2 of the draft London Plan placing greater emphasis on a design-led approach being undertaken to ensure development makes the best use of land, taking into account site context, public transport, walking and cycling accessibility and infrastructure capacity. Overall, GLA officers consider that the site is suitable for a well-designed high density scheme, taking into account the site's size close proximity to Syon Lane station and the mixed use nature of the proposed scheme, which enables residential uses to be raised significantly above the of the A4 Great West Road. Notwithstanding this, as with the Tesco Extra site, the success of any high density residential scheme will, however, depend on the potential to significantly improve the existing walking,

cycling and public transport connections and address highways severance issues in what is a relatively car dominated junction on the A4 Great West Road.

39 The draft London Plan promotes the use of a design review process to ensure that proposals for higher density development and tall buildings are subject to additional design scrutiny and to ensure good design. Whilst the density and exact height of the proposed development has not been confirmed, GLA officers consider it is likely that the proposals would trigger the thresholds for a design review which are set out in Policy D2 of the draft London Plan and recommend that the scheme is subject to a local design review at an appropriate early stage. GLA officers understand that design reviews are planned for both the Tesco and Homebase schemes, which is welcomed.

Design, layout, public realm and landscaping

40 London Plan Policies 7.1 to 7.5, together with Policies D1-D3, D7 of the draft London Plan and the Housing SPG (2016) apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming and legible movement routes, the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages.

41 The overall design strategy seeks to address the design constraints associated with the provision of a large footprint supermarket and its associated servicing and parking requirements by wrapping the store with five residential buildings and bringing the associated core entrances to ground floor level. A primary residential core entrance is proposed closest to Syon Lane station which would provide a quicker and more convenient route up onto the podium gardens for residents arriving from the station or the south, with core entrances to each block located within the communal courtyard.

42 This approach is supported and ensures that dead frontages associated with the car park and servicing area is either raised or screened from view. As discussed during the meeting, the main residents entrance lobby should be designed to be as welcoming and legible as possible given its function. A more generous double height ground floor entrance is recommended at the base of this block. The access route adjacent to Blocks B and C would include residential ground floor entrances but would be lacking in natural surveillance, particularly adjacent to the employment site to the east. The need for this route is recognised, as is the difficulty in ensuring active frontages on this side of the scheme; however, this space will need to be carefully managed and designed, with high quality materials, landscaping and lighting required to ensure it does not undermine perceived levels of pedestrian safety, particularly after dark. Some form of managed or restricted access should be considered given the lack of natural surveillance along this route. The proposals for public realm and landscaping improvements along Syon Lane and the Great West Road are strongly supported. The provision of private terraces serving residential units at podium level is supported in order to animate and overlook the communal gardens and ensure adequate privacy for these units.

Residential quality

43 London Plan Policy 3.5 and draft London Plan Policy D4 promote quality in new housing provision, with further standards and guidance set out in the Mayor's Housing SPG (2016). In accordance with this strategic priority, it is essential that residential quality is embraced fully, and baseline standards exceeded wherever possible, especially for high density residential developments of this nature. Policy D4 of the draft London Plan and the 2016 Housing SPG require developments to maximise the provision of dual aspect units and normally avoid single aspect units that are north facing or exposed to significant adverse noise impacts.

44 The pre-application documents submitted state that the scheme proposes 75% dual aspect homes and no north facing single aspect units. However, on the basis of the floorplans submitted,

there appear to be a significantly higher proportion of single aspect units within the scheme. This will need to be set out more clearly in the application documents. As discussed during the meeting, the layout of residential blocks results in a number of north-west facing single aspect units in Blocks C, D, E and A. These either face adjacent blocks or the A4 Great West Road.

45 GLA officers understand that there are constraints associated with providing residential blocks above a supermarket and acknowledge that the layout of residential blocks has been partly driven by the aim to address daylight and sunlight impacts affecting existing residential properties on Syon Lane. Further mitigation is required as part of any future planning application. Taller floor to ceiling heights (above the minimum 2.5 metre standard) should be considered for north-west facing single aspect units to ensure adequate daylight. Internal residential layouts should ensure that the potential width and outlook of internal living rooms is fully optimised. Whilst it is noted that residential units are raised to effectively the fifth floor and above, necessary noise mitigation measures should be provided where units face onto the A4 and in relation to air quality, taking into account assessments of the pollution levels.

46 The potential to provide through dual aspect units within Block B at the ends of internal corridors should also be considered, subject to this not negatively impacting the percentage of affordable housing by habitable room.

47 The unit to core ratios per floor are generally acceptable and either in accordance with the benchmark in the 2016 Housing SPG, or moderately above this level, with natural light and ventilation into the corridors provided. Given the demand likely to be placed on the cores to ground floor level, these should be made as generous, welcoming and easily identifiable as possible.

Height, massing and architectural quality

48 The height and massing of the scheme has been refined in response to the adjacent heritage assets and daylight sunlight impacts on existing properties to the west. The tallest element located to the north-eastern corner of the site and then stepped down in height towards the Grade II listed Gillette building, whilst ensuring the development creates a strong frontage along the Great West Road and responding appropriately to the prevailing character of commercial buildings along this route and the visual prominence of this corner site. This overall strategy is supported.

49 In terms of the architectural approach, two distinct approaches are proposed. A curvaceous and rounded corner building selected to mark the corner, which would pick up on the materials, colour palette and Art Deco architectural character of the surrounding buildings and the strong horizontal emphasis. In contrast, blocks to the rear and along Syon Lane would be more brick based, with a more vertical elevational gridded structure proposed in terms of the proposed facade design and massing. This approach has been well-considered and is supported. The taller element of the scheme has also been slightly angled and curved at its edges to ensure visual interest and a generally slender profile in the views provided. The robustness and quality of the materials selected for the frontage building on the A4 and the depth of architectural approach should be of an appropriately high standard, given the site's visual prominence and that of the surrounding Art Deco buildings.

50 View 4 of the Townscape appraisal (looking west along the A4) does not appear to have been provided, which will be important to assess given the height and massing proposed and the proximity of Syon Clinic. The massing of Block B has however been broken up as shown above, so that this would be read as separate vertical elements and with a distinct architectural approach taken. This is supported.

Heritage

51 Policy SD1 of the draft London Plan recognises the role of heritage in place making within opportunity areas. Paragraph 2.1.64A recognises the need to respond positively to and enhance the particularly distinctive Art Deco architecture along the Great West Corridor Opportunity Area and for the potential visual impact of development on surrounding historic landscapes including the River Thames to be fully considered where large-scale development is proposed in the area.

52 Based on the initial wireline views provided and subject to fuller assessment of verified rendered views submitted as part of any future planning application, GLA officers consider the impact of the proposed development on the setting of the Grade II listed Gillette building to be acceptable, with the submitted views provided along Syon Lane demonstrating that, whilst the scheme would alter the setting of the Grade II listed building, the stand-alone visual prominence of the Gillette factory's tower would be retained.

53 Wireline views from Syon Park, Osterley Park, Boston Manor Park and the Royal Botanical Gardens World Heritage Site have been provided, which have been taken from these locations during an appropriate time of year and demonstrate that there is very limited potential for visual impact on these heritage assets given the distance involved and existing landscape features. As such, based on the submitted assessment, GLA officers consider that the proposals would be likely to harm these designated heritage assets.

54 Notwithstanding this, further rendered views along the A4 Great West Road should be provided for assessment as part of a fuller Townscape and Heritage Visual Impact Assessment (THVIA). This should show the development in isolation and also include cumulative views, including the proposed Tesco development to the north, so that the overall impact can be considered. Any harm to the setting of heritage assets would need to be weighed against the public benefits of the development, particularly the delivery of additional affordable housing.

Climate change

55 Whilst matters relating to energy were not discussed in detail, the following standard advice is provided. The updated GLA Energy Assessment Guidance (October 2018) provides details on the information that should be provided within the energy assessment for referable applications². The following targets are in effect for planning applications that are referred to the Mayor:

- Residential – Net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations.
- Non-residential – 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The zero carbon target will apply to non-domestic developments when the new London Plan is adopted (expected in late 2019).

56 The carbon emission figures should be reported against a Part L 2013 baseline. Carbon emissions for domestic and non-domestic elements of the development should be presented separately. From January 2019, and until central Government updates Part L with the latest carbon emission factors, applicants are encouraged to use the SAP 10 emission factors for referable applications when estimating CO₂ emission performance against London Plan policies. Applicants will still need to provide an assessment of CO₂ performance using SAP 2012 emission factors to enable a comparison to be made.

² <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

Be Lean – demand reduction

57 The applicant should commit to meeting Part L 2013 by efficiency measures alone as a minimum for both domestic and non-domestic elements separately. The draft London Plan sets out the following targets for CO₂ reductions on site through energy efficiency measures alone:

- Residential – 10% improvement on 2013 Building Regulations from energy efficiency
- Non-residential – 15% improvement on 2013 Building Regulations from energy efficiency

58 Sample SAP full calculation worksheets (both DER and TER sheets) including efficiency measures alone should be provided to support the savings claimed. Information on the development's total energy demand (MWh/year) for each building use and the total Part L Fabric Energy Efficiency Standard (FEES) should be reported.

Cooling and overheating

59 The domestic overheating checklist, included in the Energy Assessment Guidance, should be used to identify potential overheating risk and passive responses early in the design process. Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the Cooling Hierarchy. Dynamic overheating modelling in line with CIBSE Guidance is recommended (TM59 and TM49 for residential and TM52 and TM49 for non-residential).

Be Clean – heating infrastructure

60 The applicant should investigate opportunities for connection to nearby existing or planned district heating (DH) networks. Evidence of communication with the relevant parties (i.e. stakeholders, local authority energy officers) should be provided to outline the current position as part of any planning application. The site wide heat network should be developed in line with the new heating hierarchy set out in Policy SI3 of the draft London Plan and further advice provided in the GLA's Energy Assessment Guidance (2018). Where CHP is proposed, this would require justification and the associated carbon and air quality impacts should be minimised. Other low carbon alternative technologies are strongly encouraged, such as air source heat pumps.

Be Green – renewable energy

61 All major development proposals are expected to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy. Solar PV should be maximised and should be accommodated in combination with green/brown roofs.

Carbon off-setting

62 New developments should maximise carbon emission reductions on-site; however, where it is clearly demonstrated that no further carbon savings can be achieved but the site still falls short of the carbon reduction targets, a financial contribution to the Council's carbon offset fund will be required using the applicable carbon offset price.

Sustainable urban Drainage

55 The proposed developments should aim to achieve greenfield run-off rates by maximising the use of above ground Sustainable Urban Drainage Systems (SuDS) in line with London Plan Policy 5.13 and Policy SI12 of the draft London Plan. Evidence will need to be provided of how this is achieved for a variety of return periods up to and including the 1 in 100-year event, with an allowance for climate change (40%). If a greenfield run-off rate is not achievable, the applicant

will need to justify why this is not possible and demonstrate that the use of above ground sustainable drainage systems (SuDS) has been maximised, in line with the London Plan drainage hierarchy.

Urban Greening

56 Urban greening is proposed including green roofs, podium level communal amenity gardens, lawns and planting areas and the provision of additional street trees and landscaping within the public realm. This is welcomed. An Urban Greening Factor assessment should be provided, demonstrating how the scheme complies with the 0.4 target set out in Policy G5 of the draft London Plan.

Transport

Retail car parking

57 The supermarket would be served by a total of 400 car parking spaces, of which 20 would be designated disabled bays and 16 marked for families with small children. In comparison, the existing Tesco Extra store to the north is served by 614 car parking spaces, so there would be a net reduction of -214 car parking spaces serving the replacement Tesco supermarket. It is also noted that there are currently 295 car parking spaces which serve the existing Homebase store. As such, comparing the existing situation with the two proposed developments, there would be an overall reduction of 509 retail car parking spaces across both sites. This reduction is welcomed.

58 Since the pre-application meeting, the applicant has submitted an additional note on parking which includes attached floorplans setting out the retail floorspace Gross Internal Area (GIA). In total, excluding plant and delivery and servicing areas, the scheme would provide 8,064 sq.m. of retail floorspace. This includes the sales floor area as well as the entrance spaces and back of house areas. This approach to measuring the retail floorspace GIA is acceptable.

59 Policy T6.3 of the draft London Plan requires new retail development to avoid being car-dependent or undermining the attractiveness of alternatives to the car, to making the most efficient use of land and include provision for rapid electric charging points. The draft London Plan sets out a maximum parking standard for Outer London Opportunity Areas of one retail car parking space per 75 sq.m. of retail floorspace (GIA). As such, the maximum retail parking standard for the site would be 108 spaces, which would be significantly exceeded by the proposals.

68 GLA officers note that the Planning Inspectors' report to the Mayor on the draft London Plan has now been published. It is notable that this report does not recommend changes to the parking policies or maximum standards in the draft London Plan, although some of the issues described above in relation to existing stores were considered. Consequently, the draft London Plan and maximum standards should carry significant weight as a material consideration.

60 Policy T6 of the draft London Plan states that, where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Policy T6I does however recognise that some flexibility may be applied where existing retail sites are redeveloped outside town centres in areas which are not well served by public transport, particularly in outer London. Taking into account the site's location and PTAL, GLA officers consider that an appropriate degree of flexibility would apply in this instance when applying the maximum standard in the draft London Plan.

60 The 2016 London Plan sets a maximum retail parking standard for PTAL 2 to 4 locations such as this which ranges from 25 to 18 car parking spaces per sq.m. of retail floorspace. The

proposals would generate a maximum parking standard of between 323 and 448 retail parking spaces. The site is predominantly PTAL 2, with the lower section of the site in PTAL 3. As such, taking into account the site's PTAL (2/3), GLA officers consider that the proposed retail parking provision (400 spaces) would accord with the higher range maximum standard set in the 2016 London Plan.

61 During the meeting, Tesco set out their position that 400 spaces they are proposing is the minimum level of parking which they would accept as landowner on this particular site, given its large function and taking into account current usage of the existing store and shopping patterns. Occupancy surveys of the existing car park should be provided as part of the Transport Assessment to confirm that this is the case.

61 The potential for these movement patterns and habits to change over time was discussed during the pre-application meeting and it was sufficiently demonstrated that the scheme is capable of adaption should the parking become redundant, with the size and dimension of the floorplan enabling change of use to office or other employment uses, which provides a welcome degree of flexibility over the longer term. A detailed parking management plan will be required to ensure that parking spaces are not used by residential units during the lifetime of the development. Rapid electric charging points and sufficient space for cargo bikes to park should be provided.

62 On balance, although the proposals would not accord with the draft London Plan, GLA officers also recognise that there would be a substantial overall reduction in parking provision based on the existing situation as well as a number of wider public benefits associated with the development. These wider benefits include the delivery of approximately 1,750 residential units, 35% affordable housing and the associated improvements in terms of public open space, public realm and walking and cycling, which would need to be secured by obligation. GLA officers are mindful that Tesco currently operate a viable store in this location, which includes a substantial amount of parking and as landowners, their consent is necessary to unlock the development of the two sites and enable the wider planning benefits set out above. Without their commercial agreement, it is unlikely that two schemes could come forward in the comprehensive manner that is proposed. As such, subject to these public benefits being secured, GLA officers would be supportive of the scheme, notwithstanding the fact that the proposals do not comply with standards set out above.

Residential car parking

63 Residential car parking ratio of 0.25 spaces per unit for the residential element of the development. This accords with the maximum parking standard set out in the draft London Plan for an outer London Opportunity Area site such as this.

Site access

64 One vehicular access point is proposed off Syon Lane, to be access both the residential and retail car park. It is recommended that barrier controls are not used to access the car park, as they may increase the risk of queueing blocking back on Syon Lane and leading to delays.

Cycle parking

65 Cycle parking is proposed to be provided in accordance with draft London plan standards for all of the proposed land uses, which is welcomed. Cycle parking should to be designed in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS). Further information is required to confirm the location, floor and size of cycle parking facilities serving residential accommodation and the access routes for residents using these

facilities. There should be consideration how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people and cargo bikes for customers undertaking shopping trips by bike. Visitor cycle parking should be located close to the main entrances of the buildings they serve.

66 Access to residential cycle parking would be via the vehicle ramp off Syon Lane or the residential core lifts. As discussed during the meeting, the prospect of cyclists sharing lifts serving residential units on a daily basis is questioned in terms of its convenience and attractiveness, as is the safety implications for cyclists sharing ramp access with vehicles using the customer car park, given this would be in frequent use. Given the land use and the residential density proposed, a dedicated cycle lift to the main cycle storage facilities on the second and third floor is recommended.

Walking and cycling

67 The proposed redevelopment of the site will see an increase in pedestrian and cycle trips to and from the site and the local area. Enhanced pedestrian and cycle connections to Syon Lane station and along Syon Lane and A4 frontage are proposed, which will need to be further developed. TfL are developing a scheme to address road safety and improve pedestrian and cycle facilities at Gillette Corner. This includes decommissioning the existing subway and introducing at grade crossings for pedestrians and cyclists. Given that the proposed development will increase pedestrian and cycle movements at Gillette Corner, a financial contribution towards these works will be required to mitigate the impact of the development, in accordance with London Plan Policies 6.3, 6.9, 6.10 and Policies T1-T5 of the draft London Plan. As set out above, the public realm and landscaping improvements proposed along Syon Lane is strongly supported.

Transport Assessment

68 The Transport Assessment (TA) should be produced, in accordance with the latest TfL guidance on Transport Assessments³. The TA will need to cover all relevant site specific transport issues, including but not limited to a multi-modal trip generation analysis and an assessment of the impacts of the development on highway, public transport capacity, details of the proposed access for all modes, car parking, cycle parking, delivery and servicing strategy, the provisions for mitigating the impacts of construction traffic, and the proposed interventions to address any potential adverse transport impacts.

Healthy Streets and Active Travel

69 The applicant is required to ensure that the Healthy Streets approach is considered both throughout the site and within the local area. TfL also expect the applicant to submit an Active Travel Zone Assessment (ATZ) as part of the application submission. This assessment will cover the key routes in the wider area, including routes to the nearest rail stations, bus stops, parks and amenities and should identify deficiencies of these routes and scope for enhancing these routes. Guidance on Healthy Streets can be found here: <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>.

Public Transport impact and mitigation

70 Bus trip generation figures by time and direction should be provided within the TA, with the peak hour indicated separately, to allow the cumulative impact of the proposed development on bus capacity to be identified, taking into account existing capacity, and to confirm whether any mitigation is required in terms of financial contributions. A minimum of two bus stands and a bus

³ <https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants>

driver facility for bus routes terminating on site should be provided. The location and design of these facilities should be the subject of further pre-application discussions with TfL.

Vision Zero

71 The Mayor's Vision Zero ambition is the elimination of all deaths and serious injuries from London's streets by 2041. The Vision Zero approach requires reducing the dominance of motor vehicles and creating streets safe for active travel. The TA should identify measures which can be used to eliminate recorded accidents and should demonstrate how the scheme will contribute towards the Vision Zero approach.

Deliveries and servicing

72 The TA is required to present the trip generation analysis for servicing and delivery vehicles and demonstrate that the proposed loading bays are adequate to meet the needs of the development. The application must be accompanied by a Delivery and Servicing Plan (DSP) that sets out the arrangements for all elements of the proposed development and supported by swept path analysis, as appropriate. Care should be taken to position the loading bays in locations where they will not conflict with pedestrians and cyclists and that visibility splays are not affected.

Construction

73 The application must be accompanied by a Construction and Logistics Plan (CLP) that details construction programme, routes for HGVs; frequency of deliveries and loading/unloading locations. Full details of what should be provided within the CLP, can be found here: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/freight>.

Travel Planning

74 A framework travel plan covering all elements of the development, which sets out the targets and the measures to be implemented, will need to be submitted as part of the application. TfL expects that the full travel plan will be secured and monitored as part of a Section 106 Agreement. The travel plan/s should be in line with TfL's Travel Planning Guidance, available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

Conclusion

75 The proposed comprehensive mixed use redevelopment of this out of town retail site is strongly supported. The affordable housing offer is Fast Track eligible, subject to the applicant fully exploring the potential for grant funding to provide additional affordable housing within the scheme and further discussion and agreement on the tenure split and affordability levels proposed.

76 Whilst the residential quality of the proposals is generally supported, further detail and discussion is required to confirm that the provision of dual aspect units has been maximised and that the proposed north-west facing single aspect units are of an acceptable quality. The proposed density, layout, design and massing of the scheme is supported, subject to the fuller assessment of the townscape, heritage and visual impact of the scheme. Notwithstanding this, the success of any high density mixed use scheme will, however, depend and public transport connections and address highways severance issues in what is a relatively car dominated location adjacent to the A4 Great West Road, and appropriate mitigation measures to address air and noise pollution levels in this location. The applicant is encouraged to undertake a design review. Further information should be provided on play space requirements and on-site provision.

77 Whilst the significant reduction in retail parking is welcomed, the proposals do not accord with the draft London Plan. Notwithstanding this, given the location and PTAL of the site, the existing car parking provision and the significant reduction proposed, GLA officers consider that an appropriate degree of flexibility would apply in this particular instance and taking into account the wider public benefits that the relocation of the Tesco store would provide by unlocking the potential delivery of up to 1,250 new homes, of which 35% would be affordable. The quantum of residential car parking proposed is acceptable. The development must contribute to TfL's emerging scheme to improve road safety and pedestrian and cycle facilities at Gillette Corner given the importance of this route to the station and increase in pedestrian and cycle trips expected. Subject to the TA and agreement of trip generation figures, financial contributions towards bus capacity improvements may be required.

for further information, contact GLA Planning Unit (Development Management Team):

[REDACTED]
[REDACTED]
[REDACTED]
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GREATER**LONDON**AUTHORITY

Good Growth

██████████@berkeleygroup.co.uk

Our ref: GLA/5244/02/ADR

Date: 16 September 2020

Dear ██████████

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: Tesco Extra, Syon Lane, Osterley

LPA: Hounslow

Our reference: 2020/5244/02

Further to the pre-planning application meeting held on 24 June 2020, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



John Finlayson

Head of Development Management

cc ██████████, Deputy Head of Development Management
██████████, TfL

Tesco Extra, Syon Lane, Osterley

in the London Borough of Hounslow

The proposal

Redevelopment of the site to construct a residential-led mixed use scheme, comprising approximately 1,650 residential units with supporting commercial, employment, leisure and community use, within buildings ranging in height from 4 to 17-storeys, together with public open space, car parking, cycle parking and associated landscaping, access and public realm (via an outline application).

The applicant

The applicant is **Berkeley St Edward** and the architect is **JTP**

Context

1 A request for a follow-up pre-planning application meeting with the Greater London Authority (GLA) to discuss a proposal to develop the above site for the above uses. On 24 June 2020, a follow-up pre-planning application meeting was held online with the following attendees:

GLA group

- [REDACTED], Principal Strategic Planner Development Management, GLA (case officer)
- [REDACTED] – Team Leader, Development Management, GLA
- [REDACTED] - Principal Strategic Planner, Urban Design
- [REDACTED] – Principal Planning Officer, Transport for London (TfL)

Applicant team

- [REDACTED] – Berkeley St Edward
- [REDACTED] – Berkeley St Edward
- [REDACTED] – Berkeley St Edward
- [REDACTED], WSP
- [REDACTED] WSP
- Architects, JTP

Local planning authority

- [REDACTED], LB Hounslow Council
- [REDACTED], LB Hounslow Council

2 This followed a an initial formal GLA pre-application meeting on the scheme with the applicant and Council which took place on 5 September 2019, in relation to which a detailed pre-application response was issued on 15 October 2019 (Ref: GLA/5244/A/01). This report covered a range of issues with respect to the principle of development; housing, affordable housing and play space; urban design, residential quality and heritage; inclusive design; climate change; and transport and should be read in conjunction with this follow-up report.

3 A separate GLA pre-application note was also issued on the concurrent, linked scheme at Homebase, Syon Lane site on 21 October 2019 (Ref: 5242/01) – also being brought forwards by St Edward - where the existing Tesco Extra store is being relocated to as part of a mixed use housing and retail development.

4 The purpose of the follow-up meeting on 24 June 2020 was for the applicant to provide an update on further design revisions to the proposed scheme for the Tesco Extra, Syon Lane site since the most recent GLA pre-application meeting and to provide further discuss the specific issues raised during that meeting and in the GLA's most recent pre-application response. During the meeting a brief update was also provided by the applicant's linked development proposal at the Homebase, Syon Lane site (GLA Ref: 5242/01).

5 On 6 July 2020, an online meeting to discuss transport modelling and mitigation measures took place online, with the following attendees:

- [REDACTED] GLA planning
- [REDACTED], TfL spatial planning
- [REDACTED] – Berkeley St Edward
- [REDACTED] – Berkeley St Edward
- [REDACTED] – Berkeley St Edward
- [REDACTED] – Hounslow Council (transport)

6 The advice given by officers does not constitute a formal response or decision by the Mayor regarding future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Details of the proposal

7 The pre-application proposals for the site envisage the demolition of the existing Tesco store and its redevelopment to construct a residential-led mixed use scheme, comprising approximately 1,650 residential units with supporting commercial, employment, leisure and community use, within buildings ranging in height from 4 to 17-storeys, together with public open space, car parking, cycle parking and associated landscaping, access and public realm. The application would be progressed via an outline application with all matters reserved, except access. The applicant has stated that the outline application would be supported by an illustrative masterplan, design code, parameter plans and a development specification.

Summary of meeting discussion

8 The follow-up GLA pre-application meeting on 24 June 2020 included a presentation and general update from the applicant on the updated scheme, which was followed by discussions covering a range of strategic issues with respect to: the principle of development; housing and affordable housing; urban design and transport, which are consequently the focus of this pre-application advice note.

Pre-application case history

9 A summary of the GLA's pre-application response dated 15 October 2019 is set out below, with further details set out in the report:

- **Principle of development:** The proposed comprehensive residential led mixed use redevelopment of this out of town supermarket site and car park is strongly supported.
- **Housing and affordable housing:** The affordable housing offer is Fast Track eligible, subject to the applicant fully exploring the potential for grant funding to provide additional affordable housing within the scheme and further discussion and agreement on the tenure split and affordability levels proposed. Further information should be provided on play space requirements and on-site provision.

- **Urban design:** Key features of the proposed masterplan and the underlying urban design rationale including, in particular, the proposal for a 0.8 hectare linear park is strongly supported. The proposed density, layout, design and massing of the scheme is supported, subject to further information being provided in relation to residential quality, as well as townscape, heritage and visual impact, together with improvements to the walking and cycling network being secured. The applicant is encouraged to undertake a design review. Notwithstanding this, the success of any high density residential scheme will, however, depend on public transport connections and address highways severance issues in what is a relatively car dominated location adjacent to the A4 Great West Road.
- **Transport:** The development must contribute to TfL's emerging scheme to improve road safety and pedestrian and cycle facilities at Gillette Corner given the importance of this route to the station and increase in pedestrian and cycle trips expected. Subject to the Transport Assessment and agreement of trip generation figures, financial contributions towards bus capacity improvements may be required.

Strategic planning issues and relevant policies and guidance update

10 The following are now relevant material considerations:

- The London Plan Intend to Publish version (December 2019)
- The Secretary of State's 13 March 2020 Directions issued under Section 337 of the Greater London Authority Act 1999 (as amended) to the extent that these directions are relevant to this particular proposal.

Principle of development

11 As noted previously, the site comprises a low density out of town retail supermarket site, which is served by a large expanse of surface car parking (614 spaces) and is located within the Great West Corridor Opportunity Area. The site's redevelopment as part of a comprehensive residential-led mixed use redevelopment is therefore strongly supported by the London Plan and the Mayor's Intend to Publish London Plan. The quantum of housing would contribute significantly towards meeting the housing targets set out in the London Plan and Intend to Publish London Plan, as well as making a substantial contribution towards achieving the indicative benchmarks for housing provision within the opportunity area. The location and scale of supporting commercial, retail, employment, leisure and community uses proposed is supported and includes scope for health care and other community infrastructure to be provided, alongside a new mobility hub, which is strongly supported, which should be secured appropriately via s106 agreement.

Housing and affordable housing

Affordable housing, viability and tenure mix

12 London Plan Policies 3.11 and 3.12 and Policy H5 of the Mayor's Intend to Publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target for 50% of all new homes to be affordable. Policy H5 identifies a minimum threshold of 35% affordable housing (by habitable room), with a threshold of 50% applied to public sector owned sites and industrial sites where there is a net loss of industrial capacity.

Affordable housing threshold

13 The application would be subject to the 35% threshold for affordable housing.

The Fast Track Route

14 To be eligible for the Mayor's Fast Track Route, applications must meet the applicable affordable housing threshold (by habitable room), in line with the required tenure mix without public subsidy. Applicants must also seek to maximise affordable housing provision above the relevant threshold through the use of grant funding and, where additional affordable housing is provided above the relevant affordable housing threshold, the tenure mix requirements are flexible, as set out in Policy H7. In addition, an Early Stage Review Mechanism would need to be secured via Section 106, which should normally be triggered should an agreed level of progress on implementation not be made within two years of the date on which planning permission was granted.

Tenure split

15 In terms of tenure split, Policy H7 of the Intend to Publish London Plan sets out the Mayor's preference for at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate housing products, with the remaining 40% to be determined by the borough. There is a presumption that the 40% to be decided by the borough will focus on low cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance.

16 In this case, GLA officers understand that Hounslow Council's adopted Core Strategy (Policy SC2) requires a 60:40 tenure split between social/affordable rent and intermediate tenure housing. GLA officers also note that the Council's draft Great West Corridor Local Plan review (2019) proposes a tenure split of 70% London Affordable Rent and/or social rent and 30% intermediate housing.

The applicant's affordable housing proposals

17 GLA officers understand that the applicant is currently seeking to agree the required tenure split and approach to affordable housing with the Council for both the Tesco Extra and Homebase site as part of a linked affordable housing offer and that the two applications combined would provide 35% affordable housing (by habitable room) across both sites and with a 50:50 tenure mix between London Affordable Rent and intermediate housing (by habitable room) across both sites.

18 To achieve 35% affordable housing across both sites, the applicant has stated that a degree of flexibility is required in terms of the overall quantum of affordable housing on the individual sites, with the Tesco Extra scheme providing 34% affordable housing and the Homebase scheme providing 38% by habitable room. The Homebase site which comprises the replacement new Tesco store would be delivered first via a detailed application and completed prior to the demolition of the existing Tesco Extra to ensure continuity of trading for Tesco. GLA officers understand that the two applications would be submitted and progressed concurrently and linked via s106 agreement. This is an acceptable approach given the very close proximity and interdependence of the two developments and does not raise any strategic planning issues, providing the key details and requirements are secured via s106 agreement.

19 The tenure mix proposed by the applicant would involve all 164 affordable homes on the Homebase site being London Affordable Rent, ensuring the front-loading early delivery of low cost rent accommodation within the first application. This is strongly supported. The Tesco Extra site would provide 34% affordable housing by habitable room, comprising 378 intermediate and 162 London Affordable Rent units. The tenure split on the Tesco Extra site would therefore be 67:33 weighted towards intermediate housing provision (by habitable room) and would also comply with the minimum tenure mix requirements set out above.

20 On this basis, subject to the applicant's proposed tenure mix being agreed with the Council, the schemes would be eligible for the 'Fast Track Route' and a Financial Viability Appraisal and late stage review would not be required.

Housing affordability

21 Policy H6 of the Intend to Publish London Plan sets out the Mayor's preferred affordable housing tenures, which includes social rent/London Affordable Rent; London Living Rent and London Shared Ownership.

22 With regards to affordable rent units, the Mayor's Intend to Publish London Plan is clear that these should be substantially below the NPPF definition and comply with the Mayor's benchmarks, for London Affordable Rent which are updated annually. For the avoidance of doubt, rents at 80% of market rent are unacceptable. Potential service charges should also be fully considered and subject to appropriate caps to ensure the overall affordability of the proposed low cost rent units.

23 London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year and a range of affordability levels should be provided below the maximum £90,000 household income cap. Any intermediate rent products, such as Discount Market Rent (DMR) or London Living Rent, are subject to a maximum income cap of £90,000. Furthermore, all intermediate tenure households should not be required to spend more than 40% of their net income on overall housing costs, including service charges.

Housing mix

24 London Plan Policy 3.8 and Policy H10 of the Mayor's Intend to Publish London Plan state that new development should generally consist of a range of unit sizes. Policy H10 sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need; the requirement to deliver mixed and inclusive neighbourhoods; the nature and location of a site in relation to town centres and public transport access; and the requirement to optimise housing potential; and the relationship between new build housing supply and demand within the existing housing stock. The proposed housing mix has not been confirmed and should be clarified and subject to further discussion, taking into account the considerations set out above.

Children's play space

25 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the Mayor's Intend to Publish London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement.

26 Further information should be provided to confirm the play space requirements of the scheme and to set out the strategy for meeting these requirements on-site as part of a play space strategy. Play space provision should be available to all housing tenures within the immediately adjacent blocks and courtyards to promote social inclusion. The GLA has published an updated play space calculator, which is available here and should be used to assess provision:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/play-and-informal-recreation>

Urban design

Design, layout, public realm and landscaping

27 London Plan Policies 7.1 to 7.5, together with Policies D1 to D3, D8 of the Mayor's Intend to Publish London Plan and the Housing SPG (2016) apply to the design and layout of development and set out a range of urban design principles requiring the provision of a high quality public realm; convenient, welcoming and legible movement routes; emphasising the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages and by optimising the permeability of sites.

28 A more contextual and landscape-led proposal is now proposed with a new architect team (JTP) now progressing the scheme following a review of the original HTA masterplan. The revised scheme proposes two internal public squares, as opposed to the linear east-west public park / route running through the site to the MOL to the east which was a defining feature of the previous masterplan. The more open civic square which was previously proposed on Grant Way has been redesigned to ensure a more sheltered and enclosed public space, which would be better framed by buildings and more animated by ground floor non-residential uses. A mix of hard and soft landscaping proposed, including mature trees to provide seasonal interest and amphitheatre seating. This approach is strongly supported.

29 The secondary public space to the east would comprise a swale, aquatic planting and play space and would be well-integrated with the movement network and green infrastructure proposed throughout the site with a greenway linking this space to Syon Lane and through to the MOL to the north. This is supported. The relationship with the Water Gardens to the north has also been significantly improved, with the proposal to transform this linear greenway into an actual water body with a wetland / habitat area fronted by leisure and residential uses and with timber viewing platforms proposed jutting out into the water at ground floor level. This is a creative landscape-led approach which helps to address what could have become a dark, overshadowed space in the previous masterplan and makes the most of this potential opportunity. Public access along the existing pathway would also be retained.

30 The pre-application documents indicate that ground floor flats and duplex apartments are proposed which would be served by their own front doors, which is strongly supported in terms of ensuring overlooking and activation and a degree of ownership of the public realm. A total of 25 townhouses are proposed which would line McFarlane Lane and Syon Lane, which help to provide a sympathetic transition to the immediate townscape context to the south and west.

31 The proposed movement framework would allow essential vehicle access to be provided whilst ensuring vehicle movement is restricted and the two main public spaces and other key routes are prioritised for pedestrians and cyclists. This is strongly supported. The street typologies proposed would also ensure a strong landscape-led approach is followed throughout the main north-south boulevard, east-west connecting lanes and along Syon Lane and McFarlane Lane, which would feature generous tree planting and verges, which is supported.

32 The emerging design code criteria and scope suggests a well-considered approach would be taken to define key layout and design principles for individual blocks and streets, including defensible spaces, landscaping, active frontages, massing, key corners, articulation and materials to facilitate the provision of a distinctive, legible and well-designed scheme which is supported. GLA officers would welcome the opportunity to review the design code, parameter plans and development specification prior to submission.

Residential quality

33 London Plan Policy 3.5, Policy D6 of the Mayor's Intend to Publish London Plan and the Housing SPG (2016) seek high quality new housing provision. Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing in Class C3 use, as set out in Policy D4 of the Mayor's Intend to Publish London Plan. Private amenity space should normally be provided to serve upper floor flats in the form of balconies, unless there are exceptional circumstances which demonstrate that site constraints mean that balconies cannot be provided. Where is the case, the required quantum of compensatory floorspace should be provided within the dwelling as mitigation. Given the outline nature of the proposal, GLA officers would expect to see these minimum housing standards included within the design code and secured via condition.

34 Single aspect units should normally be avoided and only provided where these units would constitute a more appropriate design solution in terms of optimising the capacity of a particular site whilst ensuring good design. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating and noise should also be adequately addressed and single aspect units that are north facing, contain three or more bedrooms, or are exposed to significant adverse noise impacts should normally be avoided. The 2016 Housing SPG also sets out benchmark unit per core per floor ratios.

35 Illustrative residential layout plans provided show that the outline masterplan could achieve approximately 55% dual aspect units, with some through dual aspect units proposed within the centre of linear blocks, as well as staggered and recessed dual aspect units. This layout approach is welcomed and helps to reduce the number of north-facing single aspect unit, which is 1% within the scheme. North facing single aspect units should be relatively shallow in plan form and should also be provided with higher floor to ceiling heights (above 2.5 metres) where possible. The single aspect units proposed would be predominantly east or west facing which is welcomed. Overall, based on the illustrative masterplan provided, GLA officers are satisfied that the provision of dual aspect units has been maximised, taking into account the layout and density proposed.

36 The unit per core per floor ratio is generally between 5 and 9 units per core per floor, there are a number of blocks at 10, 11 units per core per floor, although this reduces at upper floors due to the staggered massing which proposed and some blocks are served by two cores. Further information should be provided to clarify the approach. This could be acceptable in this particular instance, providing appropriate levels of management are provided and secured.

37 All of the communal outdoor amenity areas at rooftop level and within the internal courtyards and public spaces have been assessed against the BRE guidelines for direct sunlight on 21 March equinox. Of the 39 spaces tested, 92% comply with the BRE standard, including all of the public open spaces and all roof level amenity spaces. Two courtyards do not achieve the standard, but would by no later than 9 April, and far greater levels of sun penetration during summer months. This is acceptable given the density and massing of the scheme and does not raise any strategic planning concerns.

Density and design review

38 London Plan Policy 3.4 seeks to optimise housing density, with Policies D1 to D4 of the Intend to Publish London Plan placing greater emphasis on a design-led approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. Taking into account the existing context and PTAL and also noting the requirement for like-for-like replacement of existing affordable housing, GLA officers consider the site is suitable in principle for a higher density residential-led scheme. The density of the scheme should be clarified. A design review is encouraged given the likely density and height proposed.

Height, massing and tall buildings

39 With heights ranging from 3 to 17-storeys and including a series of 10, 12, 14, 15, 16 and 17-storeys, the proposed scheme would be subject to the above strategic policies in relation to tall buildings.

40 London Plan Policy 7.7 and Policy D9 of the Mayor's Intend to Publish London Plan state that tall buildings should be part of a plan-led and design-led approach, incorporating the highest standard of architecture and materials and should contribute to improving the legibility and permeability of an area, with active ground floor uses provided to ensure such buildings form an appropriate relationship with the surrounding public realm. Tall buildings should not have an unacceptably harmful impact on their surroundings in terms of their visual, functional, environmental and cumulative impacts, including wind, overshadowing, glare, strategic and local views and heritage assets.

41 A plan-led approach to accommodating tall buildings within this area of the Great West Road has been undertaken as part of the Council's draft Great West Corridor Local Plan Local Plan (2019) and supporting Masterplan (2019). This identifies the site as being potentially suitable to accommodate a tall 'focal building' between 40-50 metres AOD, adjacent to the Sky Campus, although this is subject to a full assessment of the proposals against design and heritage policy criteria and proposals achieving an exemplary design standard and subject to design review. GLA officers also note that Hounslow's adopted Local Plan Policy CC3 supports tall buildings along sections of the A4 Golden Mile subject to certain design and heritage criteria.

42 The height and massing of the scheme has been refined since the initial pre-application meeting in September 2019 with the heights reduced to 3, 4 and 5 to 6-storeys along Syon Lane and the massing stepped up towards the centre and northern boundary of the site in order to respond to the surrounding townscape and heritage context and so as to optimise daylight and sunlight levels achieved within the scheme. This is an appropriate and context sensitive approach. Whilst a full assessment of the height of the proposals will be undertaken at application stage taking into account the functional, visual, environmental and cumulative impacts set out above, GLA officers support the height and massing of the proposal which is appropriately varied and has been refined to respond positively to the surrounding opportunities and constraints.

Figure 1 - Proposed massing



Heritage impact

43 As set out in the GLA's previous pre-application advice note, there are a number of designated heritage assets both within close proximity to the site and in the wider surrounding area, including the Gillette Factory, Syon Clinic, Westlink House, 911 Great West Road and the former National West Minster Bank which are also all Grade II listed. The wider surrounding context also includes a number of designated heritage assets and landscape areas. To the west is Osterley Park, a Registered Historic Park and Garden and is covered by the Osterley Park Conservation Area, which includes the Grade I listed Osterley House. Similarly, Syon Park to the south is a registered Historic Park and Garden and falls within the Isleworth Riverside Conservation Area, which includes the Grade I listed Syon House. The Royal Botanic Gardens World Heritage Site is found further to the south-west on the other side of the River Thames. This stretch of the River Thames is also covered by the Hampton to Wandsworth Thames Policy Area. To the north-west, Boston Manor Park falls within the Grand Union Canal and Boston Manor Conservation Area and includes the Grade I Listed Boston Manor House.

44 Initial wireline views have been provided which will be assessed as part of the applicant's Townscape and Heritage Visual Impact Assessment (THVIA) showing both the proposed Tesco Extra scheme and the adjacent Homebase scheme. Any cumulative harm to the setting of designated heritage assets would need to be weighed against the public benefits of the development, particularly the delivery of additional affordable housing, public realm improvements, transport and community facilities. Where the scheme would give rise to less than substantial harm to heritage assets will need to be outweighed by the range of public benefits proposed. As set out above, the proposed height, massing and design is supported in principle and does not raise any strategic planning concerns at this stage; however, this is subject to further assessment of the planning application submission and the supporting Heritage and Townscape Visual Impact Assessment (HTVIA).

Fire safety

45 In line with Policy D12 of the Mayor's Intend to Publish London Plan, a fire statement should be prepared by a third party suitably qualified assessor and should be submitted alongside the planning application. This should demonstrate how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Policy D5 within the Mayor's Intend to Publish London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.

Inclusive access

46 London Plan Policy 7.2 and Policy D3 of the Mayor's Intend to Publish London Plan seek to ensure that new development achieves the highest standards of accessible and inclusive design. The inclusive access arrangements within the scheme should be set out clearly in the Design and Access Statement and demonstrate that the proposed public realm and all of the proposed buildings can be entered and used safely, easily and with dignity by all and is convenient and welcoming for all users, without creating any barriers to access.

47 London Plan Policy 7.2 and Policy D3 of the Mayor's Intend to Publish London Plan seek to ensure that new development achieves the highest standards of accessible and inclusive design. Policy 3.8 of the London Plan and Policy D5 of the Mayor's Intend to Publish London Plan require that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The application should include plans that show where the wheelchair accessible homes would be located and how many there would be.

These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled.

Climate change

48 Whilst matters relating to energy were not discussed, the following standard advice is provided. The updated GLA Energy Assessment Guidance (October 2018) provides details on the information that should be provided within the energy assessment for referable applications¹. The following targets are in effect for planning applications that are referred to the Mayor:

- Residential – Net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations.
- Non-residential – 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The zero carbon target will apply to non-domestic developments when the new London Plan is adopted (expected in late 2019).

49 The carbon emission figures should be reported against a Part L 2013 baseline. Carbon emissions for domestic and non-domestic elements of the development should be presented separately. From January 2019, and until central Government updates Part L with the latest carbon emission factors, applicants are encouraged to use the SAP 10 emission factors for referable applications when estimating CO₂ emission performance against London Plan policies. Applicants will still need to provide an assessment of CO₂ performance using SAP 2012 emission factors to enable a comparison to be made.

Be Lean - demand reduction

50 The applicant should commit to meeting Part L 2013 by efficiency measures alone as a minimum for both domestic and non-domestic elements separately. The Mayor's Intend to Publish London Plan sets out the following targets for CO₂ reductions on site through energy efficiency measures alone:

- Residential – 10% improvement on 2013 Building Regulations from energy efficiency
- Non-residential – 15% improvement on 2013 Building Regulations from energy efficiency

Cooling and overheating

51 The domestic overheating checklist, included in the Energy Assessment Guidance, should be used to identify potential overheating risk and passive responses early in the design process. Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the Cooling Hierarchy. Dynamic overheating modelling in line with CIBSE Guidance is recommended (TM59 and TM49 for residential and TM52 and TM49 for non-residential).

Be Clean - heating infrastructure

52 The applicant should investigate opportunities for connection to nearby existing or planned district heating (DH) networks. Evidence of communication with the relevant parties (i.e. stakeholders, local authority energy officers) should be provided to outline the current position as part of any planning application. The site wide heat network should be developed in line with the new heating hierarchy set out in Policy SI3 of the Mayor's Intend to Publish London Plan and further advice provided in the GLA's Energy Assessment Guidance (2018). Where CHP is proposed, this would require justification and the associated carbon and air quality

¹ <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

impacts should be minimised. Other low carbon alternative technologies are strongly encouraged, such as air source heat pumps.

Be Green - renewable energy

53 All major development proposals are expected to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy. Solar PV should be maximised and should be accommodated in combination with green/brown roofs.

Carbon off-setting

54 New developments should maximise carbon emission reductions on-site; however, where it is clearly demonstrated that no further carbon savings can be achieved but the site still falls short of the carbon reduction targets, a financial contribution to the Council's carbon offset fund will be required using the applicable carbon offset price.

Sustainable urban drainage

55 The proposed developments should aim to achieve greenfield run-off rates by maximising the use of above ground Sustainable Urban Drainage Systems (SuDS) in line with London Plan Policy 5.13 and Policy SI12 of the Mayor's Intend to Publish London Plan. Evidence will need to be provided of how this is achieved for a variety of return periods up to and including the 1 in 100-year event, with an allowance for climate change (40%). If a greenfield run-off rate is not achievable, the applicant will need to justify why this is not possible and demonstrate that the use of above ground sustainable drainage systems (SuDS) has been maximised, in line with the London Plan drainage hierarchy.

Urban greening

56 The potential for the scheme to accommodate urban greening and overall green cover should be maximised, in line with London Plan Policy 5.10 and Policy G5 of the Mayor's Intend to Public London Plan. An Urban Greening Factor (UGF) assessment should be submitted as part of any planning application. A benchmark target score of 0.4 would be applied to this scheme which is predominantly residential. A UGF assessment of the existing site should also be carried out to demonstrate net gains in terms of urban greening.

Transport

57 TfL have been working closely with Hounslow and the applicant's transport consultants to agree which highway design options to take forward for detailed modelling as part of the applicant's Transport Assessment. It has been agreed that three options will be progressed as part of the Transport Assessment modelling work, and once the audits are complete it will be for both TfL and Hounslow to decide which highway option sufficiently mitigates the impacts of both developments on Gillette Corner and contributes towards the Mayors Healthy Streets agenda. Further pre-application advice in relation to other transport matters is set out in the GLA's previous pre-application note.

Conclusion

58 In summary, the proposed comprehensive residential led mixed use redevelopment of this out of town supermarket site and car park is strongly supported. The applicant's 35% affordable housing offer is Fast Track eligible, subject to the tenure mix being agreed with the Council and the two planning applications being formally linked via s106 agreement in the way envisaged above.

59 The revised illustrative masterplan for the site is strongly supported and is considered to provide a more contextual, landscape-led approach compared to the previous masterplan, ensuring more more sheltered and higher quality public spaces. The design and layout would optimise the development potential and permeability of the site and the height and massing of the scheme is supported, subject to further information being provided in relation to the townscape, heritage and environmental impact. The applicant is encouraged to undertake a design review.

60 Further information should be provided on play space requirements and on-site provision and further ongoing discussion is required in relation to issues relating to transport and climate change.

[REDACTED]
