Former Alfa Laval Site, Great West Road, Hounslow  
in the London Borough of Hounslow  
planning application no. P/2009/1519

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral (new powers)</th>
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<tr>
<th>The proposal</th>
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<tr>
<td>Retention and refurbishment of the Alfa Building for use as a 180 bedroom hotel and redevelopment of the remaining site to provide a 151 bedroom hotel, 4,677 sq.m offices, 228sqm retail/community use, 206 flats, maisonettes and houses, together with associated public and private open space; access; service areas; plant; landscaping and 361 surface and underground car parking spaces. The buildings range from two to twelve storeys in height.</td>
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<th>The applicant</th>
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<td>The applicant is Carlton Properties Ltd, and the architect is Assael Architecture Ltd.</td>
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<th>Strategic issues</th>
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<td>The land use principle to provide a residential led development to include two hotels and office accommodation is in accordance with strategic planning policies and meets the policy requirements of the adopted Brentford Area Action Plan.</td>
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| The housing mix, density and accommodation quality are acceptable, and the 34% affordable housing offer is presently being independently assessed in line with strategic policy. |

| However, there are some strategic issues in relation to children’s playspace, urban design, inclusive design, climate change and transport that will need to be resolved before this application can be considered to fully comply with London Plan policy. |

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<th>Recommendation</th>
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<td>That Hounslow Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 48 of this report; but that the possible remedies set out in paragraph 50 of this report could address these deficiencies.</td>
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**Context**

1. On 20 July 2009 the Mayor of London received documents from Hounslow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 28 August 2009 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for
taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application site is referable under Categories 1A, 1B and 1C of the Schedule to the Order 2008:

- “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”;

- “Development which comprises or includes the erection of a building or buildings outside of Central London and with a total floorspace of more than 15,000 square metres.”

- “Development that comprises or includes the erection of a building that is more than 30 metres high and outside the City of London”.

3 Once Hounslow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

**Site description**

6 The regular shaped application site is 2.13 hectares in size and is bounded by the A4 Great West Road to the north, with the M4 motorway flyover above, Ealing Road to the east, Layton Road to the south and Brook Lane North to the west. The site was formerly occupied as mixed office, industrial and warehouse use but has been vacant since the early 1990s. A 1970s thirteen storey (49 metres high) office building is located towards the northwestern corner of the site and sits on a large two storey exposed concrete podium that covers a third of the whole site area.

7 The site is surrounded by a number of contrasting land uses including the raised M4 motorway to the north, low density residential to the south, with car parking and low-grade office, warehousing and commercial uses to the west. Immediately east of the site, across Ealing Road, is the Great West Quarter (GWQ) site, which is currently undergoing a major mixed-use redevelopment and includes a new 25-storey tower. The site is located within a ten-minute walk of Brentford Town centre in the southeast, which is identified as a district centre under London Plan map 3D.1.

8 The A4 Great West Road forms part of the Transport for London Road Network (TLRN) and the nearest section of Strategic Road Network (SRN) is the A315 Brentford High Street, located approximately 640m south of the site. The site has a public transport accessibility level (PTAL) of 3 (on a scale where 1 is low and 6 is high). Brentford Rail station is located approximately 965m southwest of the site. Two bus routes, numbered 65 and H91, which provide a total of 10 buses per hour between Kingston and Ealing Broadway and Hounslow and Hammersmith respectively, serve the site.
Details of the proposal

9 It is proposed to retain and refurbish the existing thirteen storey tower (building A) and basement car park and demolish the two storey podium to ground level. The retained building would be converted into a 180-bedroom hotel and a new three storey podium would be added to its east and west elevations. A new part six / part twelve storey building (building B) would be constructed east of the retained tower to front the motorway; this would be occupied as a separate 151-bedroom hotel. East of this, on the corner of Great West Road and Ealing Road, a part seven / part eight storey office block (building C) would be constructed.

10 Four residential blocks would be located to the rear of the hotel and office buildings. The two central blocks (buildings E and F) would be nine storeys stepping down to four storeys in height on their southern elevations. The block (building G) facing Ealing Road would be six storeys stepping down to two; this block would contain the small retail/community unit at its rear. The block (building D) fronting Brook Lane North would be five storeys and would contain the affordable flats. Large areas of communal open space would bisect the residential blocks, and their rear elevations would front a new street that would provide a vehicular/pedestrian link across the site between Ealing Road with Brook Lane North. Only resident cars could enter this street.

11 A new terrace of three storey houses (building H) would front the southern boundary of the new street, each with their own private rear garden. This terrace would provide a mix of private and affordable housing. The scheme would provide a total of 206 residential units; 61 for affordable housing and 145 units for market sale.

Case history

12 An application was originally submitted in April 2006 but was not received positively by Hounslow Council’s Brentford Area Committee on grounds of design, density, bulk, impact on adjoining neighbours and excessive retail floorspace and was subsequently withdrawn by the applicant. This scheme was not reported to the previous Mayor.

13 An amended application was subsequently re-submitted in April 2007 which was considered by the Mayor during May 2008 (ref: PDU/1455a) for a mixed-use development including 348 residential units, of which 103 were affordable, a hotel consisting of 194 rooms, 200 ‘apart hotel’ serviced rooms and 7,598 square metres of office space. The scheme included 488 car parking spaces. The application was again withdrawn.

14 In December 2004 (ref: PDU/0990), the previous Mayor supported a mixed-use application on the Great West Quarter (GWQ) site for retention and alteration of listed Wallis House with the re-instatement of employment use and introduction of residential use to the building. The retention, alteration and extension of International House and its use as a 201-bedroom hotel. The demolition of all other buildings on the site and redevelopment for mixed employment, community and 1040 private and affordable residential together with associated public and private open spaces, access roads, service areas, car parking spaces and landscaping. The proposed buildings range from 4 to 10 storeys in height and include a new 25-storey tower.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Land use principle: London Plan; the Mayor’s Hotel Demand Study 2006
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 Council 2003 Unitary Development Plan, the ‘Brentford Area Action Plan’ (adopted in 2009) and the London Plan (Consolidated with Alterations since 2004).

**Land use principle**

17 The application proposes a loss of mixed office and industrial floor space on site. London Plan policy only seeks to protect existing employment floor space within Strategic Industrial Locations; therefore the loss on this site outside such a location is acceptable. Furthermore, the proposed 4,677 sq.m of new office floorspace would enhance the quality and flexibility of London’s office market offer in line with strategic policy 3B.2.

18 Policy ‘M1’ of the 2009 Brentford AAP designates the site for a mixed use development providing a range of accommodation, including affordable and family housing and commercial development that should be located fronting the Great West Road. In this regard the proposed residential uses and office re-provision, with a small retail/community use, is supported.

19 The inclusion of hotel uses within the redevelopment is supported by Policy 3D.7 of the London Plan, which identifies a requirement for 40,000 net additional hotel bedrooms by 2026; 2,000 rooms alone, are expected within the London Borough of Hounslow.

20 However, given the site is located just outside Brentford designated town centre, a Hotel Sequential Assessment in accordance with PPS6 ‘Planning for Town Centres’ has been provided. The sequential test within the assessment demonstrates that there are no available or suitable sites for a hotel within nearby town centre boundaries, and that the proposed hotel would not materially harm the continued vitality or viability of these town centres in accordance with strategic policy 2A.8.

**Housing**

21 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 70% of all affordable housing should be
social and 30% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

22 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The ‘Three Dragons’ development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.

23 The application proposes a total of 206 residential units, of which 61 will be provided as affordable housing units. This equates to 30% affordable housing by unit or 34% affordable housing when assessed by habitable room. The affordable housing policies in Hounslow Council’s UDP have been deleted therefore regional policy 3A.10 will apply. This policy requires borough councils to ‘seek the maximum reasonable amount of affordable housing’ and hence a financial toolkit appraisal accompanies the application to justify the proposed affordable housing offer. The local authority has subsequently requested an independent assessment of the toolkit, therefore the contents and figures within toolkit appraisal cannot be considered acceptable until the results the independent assessment are provided to the GLA.

Tenure split

24 London Plan policy 3A.9 states that borough affordable housing targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should also take account of the London Plan strategic target that 70% of housing should be social and 30% intermediate provision, and of the promotion of mixed and balanced communities. The Mayor’s ‘Planning for a better London’ document has outlined intentions for a 60/40 split.

25 The tenure split for this scheme would be 39 as social rented, with 22 proposed as intermediate. This represents a 64:36 split between social rented and intermediate on unit numbers and a 69:31 split on habitable rooms. This split would comply with strategic policy in achieving mixed and balanced communities.

Mix of units

<table>
<thead>
<tr>
<th>No. Dwellings</th>
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</tr>
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<tr>
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<td>Studio 2b</td>
<td>Studio 3b</td>
</tr>
<tr>
<td>Studio 4b+</td>
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<tr>
<td>Overall</td>
<td>Overall Total</td>
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</tr>
<tr>
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<tr>
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<td></td>
</tr>
<tr>
<td>Social</td>
<td>Social Total</td>
<td></td>
</tr>
<tr>
<td>Intermediate</td>
<td>Intermediate Total</td>
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<table>
<thead>
<tr>
<th></th>
<th>1b</th>
<th>2b/3b</th>
<th>4b+</th>
<th>Total</th>
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<tr>
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<td>217</td>
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<tr>
<th></th>
<th>1b</th>
<th>2b/3b</th>
<th>4b+</th>
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<tbody>
<tr>
<td>Overall</td>
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<td>36%</td>
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</tr>
<tr>
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<tr>
<td>Affordable</td>
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<td>27%</td>
<td>39%</td>
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<tr>
<td>Social</td>
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<td>38%</td>
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<tr>
<td>Intermediate</td>
<td>66%</td>
<td>N/A</td>
<td>34%</td>
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Note: London Plan Housing Supplementary Planning Guidance (SPG) shown in grey type.

26 London Plan Policy 3A.5 requires new development to offer a range of housing choices in terms of the mix of housing sizes and types, taking into account of the housing requirements of
different groups. In support of this policy, the London Plan Housing Supplementary Planning Guidance (SPG) seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Recent guidance is also set out in the draft London Housing Strategy 2008.

27 The proposal would provide an acceptable mix of unit sizes across all tenures; particularly positive would be the provision of thirteen four-bed units for social rent. Policy 1.1b of the draft London Housing Strategy seeks more family sized homes with 42% of social rented and 16% of intermediate housing to have three bedrooms or more. This scheme would provide 64% three and four-bed units for social rent and 23% for intermediate, in this regard the proposal comfortably exceeds draft policy and is therefore supported. A range of housing would be provided for all social groups in accordance with policy 3A.5.

Density

28 London Plan Policy 3A.3 outlines the need for all development proposals to achieve the highest possible intensity of use compatible with local context, the design principles of the compact city (4B.1), and with public transport accessibility. Table 3A.2 of the London Plan provides guidelines on density in support of policy 3A.3. This table provides a guidance range of 70-170 units per hectare for urban sites with a PTAL rating of 2-3 that would provide an average dwelling size of 2.7-3.0 habitable rooms per unit. The residential area of the site is 1.27 hectares resulting in a density of 162 units per hectare. This density therefore sits comfortably within the guidance range of London Plan policy 3A.3 and would maximise the potential of the site.

Quality of accommodation

29 There is no differentiation in accommodation floor area size between the private and affordable housing units and this is welcomed. In terms of space standards, all units would accord with the space standards as listed in the Housing Corporation’s 721 Housing Quality Indicators (HQI). For example a two person flat would be between 45-50 sq.m, a three person 57-67 sq.m, a four person 67-75 sq.m and a 5-person two storey 82-85 sq.m. These floor spaces are in general accordance with the draft London Housing Design Guide 2009. Moreover, each unit would be of a regular shape and have good storage space, therefore providing practical and usable layouts.

30 All the units would be served by private amenity space in the form of at least one outdoor balcony that are all generous in size. There would also be generously sized areas of communal courtyard gardens separating the residential blocks, which would be easily accessed by all residents and be of a quality and usability that is expected for such a high-density scheme. The gaps between the residential blocks would ensure that these green spaces would receive good levels of natural sunlight from the south. All the single-family dwellings would be provided with private rear gardens that are all south facing, which is also welcomed. The proposal would provide a good level of outdoor amenity for all prospective residents.

31 A total of 76 flats would be single aspect, which equates to 36% of the overall residential proposal. Four of these single aspect units would be north facing, but would be served by balconies and have good outlook over a large communal terrace garden, therefore the residential amenity would be acceptable in these units. It is considered that that the building has been appropriately designed to limit the number of single aspect units to as few as possible and is supported in line with the draft London Housing Design Guide 2009. Additionally, in terms of sustainability this design layout accords with the principles London Plan policy 4A.3; which seeks to ensure developments meet the highest standards of sustainable design and construction to avoid internal overheating and minimising energy use by passive solar design and natural cross ventilation.

Children’s play space
Policy 3D.13 of the London Plan sets out that “the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ it is anticipated that there will be approximately 124 children within the development: 48 children would be under-5 years, 45 children between 5 and 11 years and 30 between 11 and 16 years of age.

The guidance sets a benchmark of 10 sq.m of useable child play space to be provided per child, with all under-5 child play space provided on-site. As such the development must make provision for 480 sq.m of play space on site. Additionally, if there is no appropriate play area within 400 metre or 800 metre distance of the site the applicant must provide play areas for children between the ages of 5 and 11 years and 11 to 16 year olds on site respectively. Gunnersbury Park is located within 400 metres, which could be safely accessed by older children from this development subject to the local planning authority ensuring that adequate play and informal recreation facilities are provided for in the park. The scheme does include 455 sq.m of dedicated playspace within the site; all this area this should be designed for under-5 year olds, and a further 25 sq.m should be incorporated so that the proposal complies with policy 3D.13.

**Ambient noise**

Policy 4A.20 states that “the Mayor will and boroughs should reduce noise by separating new noise sensitive development from major noise sources wherever practicable.” The major noise source comes from the A4 and the elevated M4 motorway to the north and busy Ealing Road to the east, and therefore the applicant has provided a noise survey report in accordance with PPG 24. This report identifies that the major noise sources would fall within the highest Noise Exposure Category (NEC) D; the advice for NEC D is that planning permission for residential development should normally be refused. In this regard, the proposed design layout would locate the non noise-sensitive uses (hotels and offices) along the M4 and the northern end of Ealing Road, with the residential elements to step down behind these larger blocks. This approach to the site layout would achieve a significant noise separation buffer for the proposed residential properties and thus the proposal accords with London Plan policy 4A.20.

However, as there would be some residential flats in block G exposed to NEC C noise from the north of Ealing Road, it may be unavoidable that some windows would need to be kept closed at certain times to provide an acceptable level of internal noise. In this case alternative means of acoustically treated ventilation must be provided that should be able to provide a rapid flow of air, as opposed to trickle vents. This airflow should not incur additional energy usage, and as such a whole building ‘passive stack’, should be utilised in block G. Failing this, mechanical ventilation or air conditioning should be provided only as a last resort. The proposed window systems for NEC C exposed facades should meet the BS 8233 ‘good criteria’ minimum and this should be appropriately conditioned.

**Air Quality**

There are no strategic issues concerning the proposed development, however, from discussions with the council’s Environmental Health Officer, it is understood that the air quality assessment chapter within the Environmental Statement is considered insufficient on a number of technical issues. It is therefore recommended that the applicant continues discussion with the council’s Environmental team and submit further information as requested during the planning application stage or agree to an appropriate planning condition.

**Urban design**
Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London and states that the Mayor will seek to ensure that new developments maximise site potential, enhance public realm, provide a mix of uses, are accessible, legible, sustainable, safe, inspire, excite and delight in respect of London’s natural and built heritage. In addition to Chapter 4B, London Plan policies relating to density (3A.3), and sustainable design and construction (4A.3) are also relevant. Other design polices in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon network.

Figure 1: Proposed view from north across flyover with GWQ site’s 25 storey tower in background (Source: Assael Architecture)

Massing and scale

The contextual response of the proposed buildings to the scale of the surrounding built environment is positive. The scheme layout proposes a range of building heights that respond appropriately to the mixed-use context of the wider area. The raised M4 motorway to the north presents a considerable visual, noise and air quality impact for the site. To address this, the scheme locates the taller commercial (hotel and office) uses to the north adjacent to the raised motorway.

The applicant is proposing to retain the existing office building, located at the corner of the M4 and Brook Lane north, and to convert it into a new hotel. The reuse of an existing building accords with the objectives of the London Plan Sustainable Design and Construction SPG, and is supported. The proposed building heights and form along the M4 are varied and serve to present a visually interesting built environment as one travels along the M4, this variety buildings and the aspiration not to create a bland and uniform wall onto the M4 is supported.

As the site travels south, away from the M4, the buildings gradually reduce in height and scale, culminating in three storey town houses that would sit adjacent to the existing low-density two storey houses. The overall design approach in terms of location of uses, massing and height is
supported, as is the intent to shield the residential buildings from the hostile environment of the M4.

Connections

41 The scheme proposes a new road running from east to west across the southern section of the site, which is to be designed as a shared surface route. The location of the route would connect with the newly proposed route that runs across the GWQ site. The joining of these routes would facilitate movement across the area and will improve access to the train station, and is supported.

42 This new road will become a relatively busy thoroughfare and its detailed design must encourage walking and cycling, whilst also accommodating vehicles and meeting the needs of residents to provide a safe and secure street. The inclusion of front doors along both sides of the street is welcomed. However, to address the concern over the detailed design, the local planning authority is encouraged to secure a planning condition requiring the detailed design of this route (and all other routes) to be submitted for approval.

43 At the pre-planning application meeting a concern was raised with regards the number of north/south pedestrian routes across the site. Providing two routes would have had the potential to dilute movement and activity resulting in two underused routes. The applicant has now substituted one of these public routes for a courtyard space. This approach is welcomed and also provides additional, defined, amenity space for residents. The proposal to focus north/south movement on one route is welcomed. However, the applicant should provide further information as to the detailed design of this route, in particular; what design measures will be included to illustrate that this is a public route to encourage movement along it as well as further design detail of the route around the base of the existing office building.

Open spaces

44 The scheme now includes two semi-private spaces for residents, which are welcomed. However, at this stage only limited information on the arrangement of these private courtyards has been provided, in particular the applicant should provide further information on how inclusive access into the courtyards is provided, particularly from the street, along with further detail on the boundary treatments between the public and private spaces.

45 The scheme includes a small public space at the southern corner of Ealing Road and the new east to west road across the Alfa Laval site. This new space helps to mark the new east to west connection that will run through the neighbouring GWQ site and into this site. In this regard the principle of providing a small public space to act as a marker in this location is supported. The success of this space is dependent on its design, and the applicant has orientated the new community unit and a residential unit in building G to overlook this space, which has presented a design layout to encourage activity. The design and location of this space is now supported.

Ealing Road ground level

46 The applicant has successfully incorporated ground level residential units into residential building G, which will improve overlooking and interaction with Ealing Road. This design amendment is welcomed.

Inclusive design

47 The floor plans and access statement fail to demonstrate that the design of both hotels would provide wheelchair accessible hotel bedrooms. Given the shortage of wheelchair accessible hotel bedrooms in London consideration should be given to increasing the number of fully
wheelchair accessible bedrooms above the minimum 5% in each hotel, required under the Building Regulations, which is advocated in London Plan policy 3D.6. Any future hotel operator should be assessed against the National Accessible Scheme as set out by Visit Britain: www.visitbritain.com/en/accommodation/national-accessibility-scheme. This should be clarified and included in a revised access statement.

48 With regards to the residential development, a comprehensive access statement has been provided which clearly demonstrates how all the units would meet each of the sixteen Lifetime Homes standards, and floor plans of each typical unit layout have also been provided. The statement also demonstrates how all unit types would conform to the fourteen criteria of the Mayor’s ‘Wheelchair Accessible Housing Best Practice Guidance’, that confirms at least 10% of the units would be wheelchair adaptable. Floor plan drawings are provided to illustrate how typical unit types would be adapted. The proposal complies with strategic policies 3A.5 and 4B.5.

49 A minimum of 10% disabled parking has been provided across the uses on the site. The proposals also identify a number of other opportunities where disabled spaces could be provided for future use and this is welcomed.

Climate change

50 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions.

Mitigation

51 London Plan policies 4A.3-11 focus on mitigation of climate change and require a reduction in a development’s carbon dioxide emissions through the use of passive design, energy efficiency and renewable energy measures. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewables.

Be lean

52 The applicant has submitted an energy assessment in accordance with London Plan policy 4A.4 and the content of this report acceptably follows the energy hierarchy as set out in policy 4A.1. The baseline carbon dioxide emissions are 1,890 tonnes per annum, which is based on SAP and SBEM modelling in line with policy requirements and also non-regulated energy use has been accounted for, with adequate supportive documents provided.

53 The proposals include a range of energy efficiency measures, which would reduce carbon dioxide emissions by 11% compared to a building regulations 2006 compliant development. The measures include improved building fabric thermal performance and air tightness than required by building regulations 2006, an energy efficient lighting and control systems. These measure are in line with policy London Plan 4A.3.

Be clean

54 The proposals include a single energy centre feeding a communal heat network connected to all heat loads. In compliance with policy 4A.5, the applicant has also investigated the possibility of connecting to adjacent sites, which turned out negative due to other developments constraints;
email conversations have been provided to support this. An indicative layout of the communal heat
network is provided, which appears reasonable and drawings are provided to indicate that enough
space has been allocated to the energy centre. All elements of the heat network would be metered.

55 With regards to policy 4A.6, the proposals include natural gas-fired CHP with 238 kW
electrical and 359 kW thermal capacities. This would contribute with a further carbon dioxide
reduction of 21.5% over and above the savings due to energy efficient design. The CHP sizing is
supported by heat profiles.

56 The proposals also include a cooling strategy for the commercial elements of the
development. Cooling would be provided through water loop heat pumps that upgrade or
downgrade the temperatures in a circulation loop connected to both the communal heat network
and cooling towers. The carbon savings compared to a conventional system is 7%. It has been
appropriately justified not to incorporate CCHP.

Be green

57 In terms of renewable energy, the proposals include 69 sq.m of photovoltaic (PV) panels to
contribute towards the carbon dioxide reduction target of 20%. Although the sketch showing the
proposed locations are of poor quality it seems there may be some more scope for increasing the
amount of PV panels, and the applicant should comment on this. Currently the PV panels provide a
further 0.28% and it is acknowledged that contributions from PV would be small due to the nature
of the development. The renewable energy proposals are broadly compliant with policy 4A.7.

Adaptation

58 London Plan policy 4A.9 outlines five principles for ensuring effective adaptation to
climate change in new developments. These are to minimise overheating and contribution to
heat island effects, minimise solar gain in summer, contributing to flood risk reductions,
including applying sustainable drainage principles, minimising water use and protecting and
enhancing green infrastructure. Policies 4A.10 – 4A.16 cover strategic issues relating to
overheating, living roofs and walls and water efficiency. Further guidance is given in the Mayor’s
Supplementary Planning Guidance (SPG) ‘Sustainable Design and Construction’, which sets out
the Mayor’s essential and preferred standards for sustainable design and construction.

59 The applicant has provided a sustainability statement that demonstrates that all the
Mayor’s essential standards would be achieved, as set out in the SPG. Additionally, there is a
commitment that the hotels and office would achieve a BREEAM pre-assessment rating of ‘very
good’ minimum, and all the residential units would achieve Code for Sustainable Homes ‘level 3’
minimum. The proposals would also include 500 sq.m of brown roofs and incorporate Sustainable
Urban Drainage systems (SUDs). The proposal is supported in terms of the principles of climate
change adaptation.

Transport

60 A total of 361 car parking spaces are proposed: 181 for residential use, 162 for hotel use
and 16 for the office use, with a further 2 car club spaces being provided. Given the site has a
PTAL rating of 3 this level of car parking should be reduced to ensure that the proposed
development complies with London Plan policy 3C.23 ‘Parking Strategy’ (including Annex 4). In
addition to this TfL requires the implementation of a parking management plan to control any
overspill parking in the vicinity, this should be secured by condition or in the s106 agreement.

61 A total of 254 cycle parking spaces are proposed, which complies with TfL’s ‘Cycle parking
standards’. All cycle parking should be safe, covered and secure. The applicant should investigate
the possible implementation of a new cycle route along Ealing Road to connect the site with the existing cycle routes in the vicinity. This will ensure compliance with London Plan policy 3C.22 ‘Improving conditions for cycling’.

62 TfL welcomes the proposal to provide a car club and that this will be secured and funded through the s106 agreement.

63 With regards to trip rates, TfL considers some of the sites selected for the residential and office trip rates to be inappropriate due to age and location. Additional trip generation information will be required to include separate calculations for TRAVL and TRICS trip rates for all modes. Additionally, TfL requires evidence that the modelling has been validated in accordance with Directorate of Traffic Operations modelling guidelines, including queue length surveys and signal timing sheets.

64 As part of the formal TfL pre-application process, the applicant was supplied with a Pedestrian Environment Review Software (PERS) assessment of the pedestrian environment, however this has not been used to inform the transport assessment (TA). The photo audit of the surrounding crossing facilities is not considered acceptable. TfL requires additional information on the condition of the crossing facilities, and where deficiencies exist a financial contribution will be sought. It has been noted by TfL that the applicant has committed to improving all footpaths bordering the site and this is welcomed.

65 The TA states that the internal access road will be a shared surface. TfL requests that appropriate surface treatments and tactile delineation is used to ensure a safe walking environment for all pedestrians.

66 The proposed zebra crossing on Ealing Road is welcomed, and this should fully comply with BV165 standards. TfL requests that the applicant to investigates replacing the subway under the A4 Great West Road with an at grade pedestrian crossing.

67 TfL notes that the Ealing Road/Great West Road crossing is uncontrolled and there is currently no pedestrian phase incorporated into the cycle. TfL expects the applicant to introduce a pedestrian cycle at this crossing as part of the development proposals. The above improvements to the pedestrian environment will ensure full compliance with London Plan policy 3C.21 ‘Improving conditions for walking’.

68 TfL requests the submission of a construction logistics plan, as set out in the London Freight Plan 2008, to be secured by condition. This should to consolidate and reduce the number of road trips generated. TfL would welcome a commitment by the developer to use environmentally sustainable firms who are members of TfL’s Freight Operator Recognition Scheme that would ensure compliance with London Plan Policy 3C.25 ‘Freight Strategy’.

69 A full workplace and residential travel plan has been submitted as part of this application which is welcomed. However, baseline mode share data predicted in the TA should be included in the travel plan in support of the targets set. Following planning consent individual travel plans will need to be prepared for land uses exceeding TfL thresholds, and a commitment to this should be included in the travel plan.

70 Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.
Section 106 contributions

71 Bus route 235 is proposed to be extended from Brentford town centre to run past this site and is being partly funded through the Great West Quarter development located adjacent to this proposal. This proposal would generate additional passenger demand for three bus routes: 235, 65 and H91, which run past the site. TfL therefore requires a financial contribution of £396,000 towards local bus service improvements. This contribution will consist of £132,000 per annum for a three-year period following occupation.

72 The bus stop audit survey submitted identifies deficiencies with four of the bus stops assessed. It should be noted that kerb heights have not been included within the assessment. To ensure all bus stops are in line with TfL’s ‘Accessible bus stop design guidance’ a total financial contribution of £40,000 is required to upgrade the four bus stops identified. This will ensure full compliance with London Plan policy 3C.20 ‘Improving conditions for buses’.

Transport summary

73 In summary, TfL supports this development in principle transport terms, provided all the issues outlined above are satisfactorily addressed. This includes a reduction in the level of car parking, the implementation of a parking management plan and a new cycle route on Ealing Road. Additional trip generation information, a financial contribution of £396,000 and £80,000 towards improving bus services and upgrading bus stops. Further information on the condition of pedestrian crossings and the use of appropriate surface treatments, and the investigation of replacing the subway under the A4, and a new pedestrian cycle on the current Ealing Road/Great West Road crossing. A construction logistics plan would also be required.

Local planning authority’s position

74 The view of the local planning authority is not known at the time of writing of this report.

Legal considerations

75 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

76 There are no financial considerations at this stage.

Conclusion
London Plan policies on hotel development, mixed-use development, housing, children’s playspace, ambient noise, air quality, urban design, inclusive design, climate change mitigation and adaptation and transport are all relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Land use principle:** The proposed mixed-use development to include residential, hotel and office space are acceptable and in accordance with London Plan policies 2A.8, 3B.2, 3B.3 and 3D.7

- **Housing:** Whether the offer of 34% (habitable rooms) as affordable housing, is the ‘maximum reasonable amount’ for the site is subject to the results of an independent assessment of the applicant’s financial toolkit appraisal that is currently being undertaken in accordance with policy 3A.10 and the Mayor’s London Plan Housing SPG and the 2008/09 ‘Affordable Housing: Development Control Toolkit’. The tenure split of 69% social and 31% intermediate is compliant with policy 3A.9; the range and mix of housing is compliant with policy 3A.5 and would include a good quantum of family sized units; the residential density of 162 units per hectare accord with policy 3A.3 and the quality of accommodation is of a good standard with good sized internal floor space.

- **Children’s playspace:** The scheme proposes 180 sq.m of playspace for under-5 year olds and 275 sq.m for 5-11 year olds. This total area falls 25 sq.m short of what is required for under-5 year olds alone, contrary to policy 3D.13. No onsite space for above 5 year olds is required as the site is within 400 metres of Gunnersbury Park.

- **Urban design:** The proposal for retaining and refurbishing the existing tall building, and creating a site layout which appropriately responds to the mixed-use context of the wider area and the raised M4 motorway by including a range of building heights is supported and compliant with London Plan policies 4B.1, 4B.2, 4B.8, 4B.9, 4B.10 and 4B.13, subject to suggested planning conditions for the detailed design of the new roads and how inclusive access would be achieved all open spaces.

- **Ambient noise:** The non noise-sensitive uses (hotels and offices) would be located along the M4 and the northern end of Ealing Road, with the residential elements to step down behind these larger blocks. This approach would achieve a significant noise separation buffer for the proposed residential properties and thus the proposal accords with London Plan policy 4A.20, subject to standard local authority noise conditions.

- **Air quality:** No strategic issues raised.

- **Inclusive design:** The application fails to demonstrate that the design of both hotels would provide wheelchair accessible hotel bedrooms contrary to London Plan policies 3D.6 and 4B.5. The access statement clearly demonstrates that all the units would meet the sixteen Lifetime Homes standards and that all units would conform to the fourteen criteria of the Mayor’s ‘Wheelchair Accessible Housing Best Practice Guidance’. The residential proposals comply with strategic policies 3A.5 and 4B.5.

- **Climate change mitigation and adaptation:** The climate change mitigation proposals broadly comply with the climate policies of the London Plan, particularly 4A.3, 4A.4, 4A.5, 4A.6 and 4A.7 for reasons set out paragraphs 52-57 above, subject to investigating increasing on the proposed area of photovoltaic panels. The sustainability statement provided demonstrates how all the climate change adaptation principles would be achieved in accordance with policies 4A.10 – 4A.16 and the Mayor’s Supplementary Planning Guidance (SPG) ‘Sustainable Design and Construction’.
• **Transport:** TfL supports this development in principle subject to all the issues outlined in paragraphs 60–73 being satisfactorily addressed, including agreement to a financial contribution of £396,000 and £80,000 towards improving bus services and upgrading bus stops to be secured as part of the s106 legal agreement.

78 On balance, whilst the application conforms generally to the London Plan, it fails to secure compliance in several regards.

79 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

• **Children’s playspace:** An additional 25 sq.m of playspace should be included onsite and added to the already proposed 455 sq.m playspace. The total 480 sq.m should be designed for use by under-5 year olds.

• **Urban design:** The local authority should secure appropriate planning conditions for the detailed design of the new roads and how inclusive access would be achieved all open spaces.

• **Inclusive design:** The application should ensure that at least 5% of rooms are fully wheelchair accessible in each hotel, which should be clearly shown on the floor plans and referenced to in a schedule within the access statement. A typical floor plan layout of an accessible room should also be provided.

• **Climate change mitigation and adaptation:** The applicant is requested to investigate the feasibility of increasing on the proposed area of photovoltaic panels.

• **Transport:** The applicant should address all issues outlined in paragraphs 60–73 and agree to a financial contribution of £396,000 and £80,000 towards improving bus services and upgrading bus stops to be secured as part of the s106 legal agreement.

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