Strategic planning application stage 1 referral


The proposal

A hybrid application for the demolition of all existing buildings and structures, and the erection of seven buildings ranging in height from 5 to 10 storeys with a maximum overall floorspace of up to 49,250 sq.m. comprising: up to 452 residential units; 601 sqm of flexible commercial accommodation; 301 sqm of community/leisure use and ancillary parking. Full details are submitted for of Blocks A1/A2, C and D1-D6 and for means of access, layout and scale of Blocks B1 and B2.

The applicant

The applicant is Waterside Places, the architect is Grid.

Strategic issues

Principle of development: A mixed use development of the site is established by an extant consent and a site allocation. The proposal includes an uplift of 239 residential units which is supported by London Plan and draft London Plan policy. (paragraphs 16 to 18).

Affordable housing: The scheme proposes 50% affordable housing which meets the ‘Fast Track Route’ requirements in compliance with draft London Plan Policies H5, H6, and H7 and the Mayor’s Affordable Housing and Viability SPG, but the affordable units in Phase 2 must be secured. An early review mechanism must be secured and affordability levels confirmed. (paragraphs 19 to 24).

Design: The overall design is supported subjected to minor improvements to the residential quality. The development will not impact on the Kew Gardens WHS and has no harm on heritage assets (paragraphs 27 to 43).

Transport: The applicant must address issues with respect to: transport assessment, Commerce Road layout changes, construction logistics, delivery service plan and trip generation, and travel plan. The increased width of the canal footbridge is supported (paragraphs 53 to 63).

There are also outstanding issues in relation to play space, energy and flood risk.

Recommendation

That Hounslow Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 68; but the possible remedies set out in that paragraph could address these deficiencies.
Context

1 On 24 September 2018 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 must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and draft 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 is referable under Categories 1A, 1B and 1C of the Schedule to the Order 2008:

1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.

1B: 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: (c) outside Central London and with a total floorspace of more than 15,000 square metres.

1C: Development which comprises or includes the erection of a building of one or more of the following description: (c) the building is more than 30 metres high and is 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) Regulations 2011 has been taken into account in the consideration of this case. The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is located to the north-west of Brentford town centre and forms the final phase of the consented Brentford Lock West masterplan. It is 1.95 hectares and is bound to the east by the Grand Union Canal, the railway line into London Waterloo Station to the north, Brentford Bus depot and commercial buildings to the west and existing residential uses of the earlier phases of the masterplan to the south. The predominant existing land use is warehousing.

6 There are no statutory or locally listed buildings within the site, but the boundary of the Grand Union and Boston Manor Conservation Area follows the route of the canal and includes the wet dock over which parts of the existing warehouses overhang. The wet dock is located within the site boundary.

7 The site is located on Commerce Road off the A315 High Street/London Road, which is part of the Strategic Road Network (SRN). The A4, the nearest part of the Transport for London Road Network, is approximately 1 kilometre away by road. Bus route E2 terminates on Commerce Road and four others run along the High Street. Brentford railway station is 500 metres linear distance away and the site has a PTAL of 2 – 3 representing a poor to average level of access to public transport.
Details of the proposal

8 The proposals are for a hybrid application. Outline details are submitted for the demolition of all existing buildings and structures and the part reconstruction of an existing overhanging warehouse building and the erection of seven buildings ranging in height from 5 to 10 storeys comprising a maximum overall floorspace of up to 49,250sqm (GEA). The new buildings would comprise up to: 38,225sqm (GIA) of residential accommodation (Class C3, equating to a maximum of 452 residential units); 601sqm (GIA) of flexible commercial accommodation (Class A1/A2/A3/A4/B1); 301sqm (GIA) of community/leisure use (Class D2); ancillary parking (equating to up to a maximum of 164 car parking spaces and cycle and motorcycle spaces); circulation, servicing, plant and storage areas; new vehicle and pedestrian access; and new public amenity space and landscaping including a new public square.

9 Full details have been submitted for the access, appearance, landscaping, layout and scale of Blocks A1/A2, C and D1-D6. Full details have also been submitted for the means of access, layout and scale of Blocks B1 and B2 with internal layouts of the individual buildings, appearance and landscaping of courtyards reserved.

Case history

10 The site forms part of an outline consent for the wider Brentford Lock West Masterplan approved in 2012 (PDU/2666). The consent is for up to 520 residential units (with 213 in the final phase 3), 6,780 sq.m. of commercial space, 840 sq.m. restaurant/cafe and 840 sq.m. of leisure and community uses. The proposals included a replacement bus depot located on the north-western corner of the site and a new bridge link across the canal, these are subject of reserved matters applications.

11 The site has also been subject of a refused application for the development of 992 residential units, commercial and leisure uses, shops, restaurants and bars, a healthy day centre. The application was appealed for non-determination and the appeal was dismissed, on the grounds of land use mix, density, quality of design and lack of public and private space.

12 The application proposals were subject to the GLA pre-application process and a pre-application report was issued on 3 November 2017. Issues were raised in relation to affordable housing, design and residential quality, transport, energy and flood risk.

Strategic planning issues and relevant policies and guidance

13 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 2016 London Plan (Consolidated with Alterations since 2011).

14 The following are relevant material considerations:

- The National Planning Policy Framework 2018 and National Planning Practice Guidance
- The draft London Plan 2017, incorporating Minor Suggested Changes, which should be taken into account on the basis explained in the NPPF.
- In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance. This must now be read subject to the decision in R(McCarthy & Stone) v. Mayor of London

15 The relevant issues and corresponding policies are as follows:
• Land use principle
  *London Plan; draft London Plan;
• Housing and affordable housing
  *London Plan; draft London Plan; Affordable Housing & Viability SPG; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG; the Mayor’s draft Housing Strategy;
• Urban design
  *London Plan; draft London Plan; Character and Context SPG;
• Inclusive design
  *London Plan; draft London Plan; Accessible London: achieving an inclusive environment SPG;
• Sustainable development
  *London Plan; draft London Plan; Sustainable Design and Construction SPG; London Environment Strategy;
• Transport and parking
  *London Plan; draft London Plan; the Mayor’s Transport Strategy.

Principle of development

16 The current application proposes the intensification of the previous phase 3 of the Brentford Locks consented masterplan. The new proposals for phase 3 are for 452 units compared to 213 units under the consent and will result in the overall masterplan residential component increasing from 520 to 759 units. As a result of the new proposal the quantum of proposed employment floorspace will also be reduced from 3,675 sq.m. to 601 sq.m.

17 The applicant has provided a full explanation for the reduction of employment floorspace and this is supported by a commercial marketing report which demonstrates that the site has been marketed to potential occupiers for 5 years. Most of the consented scheme employment floorspace was to be occupied by Brompton Bikes who had expressed an interest in the location as the proposals were being developed. However, once consent was granted the negotiations failed and Brompton Bikes decided on an alternative location for its factory/research facility. This meant the applicant had to seek alternative occupiers for the site and the site was marketed for a continuous period since 2012 generating very limited interest and resulted in the Masterplan phase 3 employment floorspace not being implemented. Recent market research for the current applicant continues to demonstrate limited interest in the site and confirmed that the focus of B1 activity will be on Great West Road and Brentford High Street and streets connected to the High Street. At pre-application Hounslow Council officers supported this position.

18 The site is allocated in the Hounslow Local Plan for mixed-use development including residential, commercial, waterside leisure, education and community uses. This together with the planning consent establish the principle of a mixed-use development of the site. Given the marketing evidence and the status of the site as having no current designation as either SIL or as locally significant industrial location, the reduction in employment floor space is accepted. The current scheme would provide a significant uplift in residential units compared to the extant consent, which is supported by draft Policy H1 ‘Increasing Housing Supply’ and Table 4.1 of the draft London Plan (Policy 3.3). These policies set Hounslow an annualised average housing completion target of 2,182 units (822 in the current London Plan) per year between 2019/20 and 2028/29.

Housing

Affordable housing

19 London Plan Policies 3.11 and 3.12 and draft London Plan Policies H5 and H6 seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50% to be
achieved across London. Policy H6 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG set out a ‘threshold approach’ whereby schemes meeting or exceeding a specific threshold of affordable housing by habitable room (in this case 50% as the land was formerly in industrial use), without public subsidy, and which meets other criteria, are not required to submit viability information to the GLA, nor would the application be subject to a late stage review mechanism. Draft London Plan Policy H7 and the Mayor’s SPG sets out a preferred tenure split of at least 30% low cost rent (social or affordable rent, significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the preferred tenures), and the remaining 40% to be determined by the local planning authority.

20 This application would deliver a total of 50.7% affordable housing by habitable room. This would be achieved through the delivery of 187 affordable units within the current Phase 3 development, and additionally, 58 private units within the completed Phase 2 development have been sold to Thames Valley Housing to deliver as shared ownership units. The housing delivered in each phase is set out below:

<table>
<thead>
<tr>
<th>Units in Phase 3</th>
<th>London Affordable Rent</th>
<th>Flexible Affordable Rent/ DMR/ intermediate</th>
<th>Shared Ownership</th>
<th>Market/ PRS</th>
<th>Total units</th>
<th>Total (HR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Units HR</td>
<td>124 389</td>
<td>18 63</td>
<td>45 114</td>
<td>265 689</td>
<td>452 1,257</td>
<td></td>
</tr>
<tr>
<td>Units in Phase 2</td>
<td>0 0</td>
<td>0 0</td>
<td>58 148</td>
<td>0 0</td>
<td>58 148</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>124 389</td>
<td>18 63</td>
<td>103 264</td>
<td>265 689</td>
<td>510 1,405</td>
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<tr>
<td>Total HR</td>
<td></td>
<td></td>
<td>716 689</td>
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<tr>
<td>% HR Affordable</td>
<td></td>
<td></td>
<td>51 49</td>
<td></td>
<td></td>
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<tr>
<td>Total Units</td>
<td></td>
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<td>245 265</td>
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<tr>
<td>% Units Affordable</td>
<td></td>
<td></td>
<td>48 52</td>
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21 The extant consent for the Brentford Lock West Masterplan (Phases 1, 2 and 3) secured 520 units, of which 102 were affordable, equating to 19.6% by unit. As a result of the current standalone application, the number of units in the overall masterplan would be increased to 759 units, of which 245 units would be affordable, equating to 32% by unit and 41% by habitable room. In this case, given that the current application will deliver a significantly increased amount of affordable housing in the masterplan overall, and over 50% affordable housing in itself, the Fast Track Route can be applied to this standalone application, whilst taking into account the additional affordable housing delivered in Phase 2. To follow this approach, however, it must be confirmed that the Phase 2 units will be secured as affordable housing in perpetuity.

22 London Affordable Rent would be secured as the low cost rented component of the affordable housing proposals, which is welcomed. This equates to 54% of the affordable housing mix, and thus complies with the required tenure split for the Fast Track Route. The affordability of the shared ownership and flexible affordable rent/intermediate/DMR units must accord with the requirements of Policy H7 of the draft London Plan, the Mayor’s Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. Any discounted market rent units (DMR)
should be secured at London Living Rent Levels, or at rents significantly below 80% of market rents. The intermediate shared ownership units will be based on the London Plan AMR criteria (40% of net income) at discounts below £90,000 upper limit, but a range of discounts below this upper limit must be sought. The affordability of the units must be confirmed before Stage 2.

23 An early stage (delayed implementation) review mechanism must be secured in accordance with Policy H6 of the draft London Plan and the Mayor’s SPG.

24 The scheme may include an element of Build to Rent housing, although the applicant wishes to keep this flexible pending identification of BtR operator. London Plan Policy 3.8 and draft London Plan Policy H13 ‘Build to rent’ and guidance within the Affordable Housing and Viability SPG identify BtR housing as addressing a distinct need, and recognise that the model is becoming increasingly important in terms of supporting labour market mobility. As such, the provision of some BtR housing is supported in principle, but in accordance with draft Policy H13 and the Affordable Housing and Viability SPG these units must be subject to a minimum 15 year covenant, with a clawback mechanism secured should any units be sold out of BtR tenure within the covenant period.

Housing choice

25 London Plan Policy 3.8 ‘Housing Choice’ encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy H12 ‘Housing size mix’ of the draft London Plan states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes; and for low cost rent, boroughs should provide guidance on the size of units required to ensure housing meets identified needs.

26 The proposals are broadly in line with the Council’s Core Strategy preferred housing mix of 30% of low-cost rent units to be 3/4 bed family-sized. The market and shared ownership units provide mainly one and two bed units, which is supported in this location and allows the shared ownership units to offer better affordability.

Urban design

Layout

27 The development layout adopts a street and podium block form with a freestanding building facing the canal and provides for a new canal side public space with adjacent canoe facility. The street form creates a high degree of continuity with the adjacent earlier phases of the Brentford Locks masterplan. It has been improved since the pre-application stage with the revision of ground floor plans of blocks A and B that have removed large areas of inactive frontage, through inclusion of additional residential units and changes to commercial ground floorplans.

Height, massing, scale and appearance

28 The broad layout, heights and massing principles are supported and aligned with the outline consent. The applicant has completed an overshadowing analysis and wind assessment and has mitigated against identified impacts on the public realm in line with draft London Plan Policy D7 Public realm and D8 Tall buildings.

29 As requested at pre-application, details of the reconstructed warehouse structure along the canal edge and the separation distance between the adjacent balconies has been provided and demonstrates that the quality of outlook is not affected.
The development detailed design suggests a high quality of architecture and detailing of brickwork will be delivered, consistent with the high quality of phases 1 and 2 and this is welcomed. The intention to draw directly from the form and proportions of canal side warehouse buildings and potential to create a distinctive character, with defined public spaces consistent with the heritage of the area is supported.

Residential quality

London Plan Policy 3.5, and Policy D4 of the draft London Plan set out housing quality, space, and amenity standards, with further detail provided in the Mayor’s Housing SPG.

Many aspects of the design would provide a scheme of high quality: for instance, there are multiple access cores, the units meet minimum space standards, 2.5 metre floor to ceiling heights have been adopted and private amenity space balconies have been adopted of the appropriate size. There are however some aspects of the layout and individual floorplans that require further work to improve residential quality, shared amenity and playspace provision.

The introduction of additional ground floor residential units to blocks A and B are welcome. However, as requested at pre-application, these units should be converted to duplex units to improve the residential quality in terms of daylight standards and allow for provision of amenity space at podium level or at least access to the shared amenity spaces.

The access arrangements for blocks B1 and B2 of the affordable units to podium gardens should be reconsidered to improve residential access to amenity space. These are taller blocks containing a large number of affordable units but share only a single podium garden. This provision should be improved by providing Block B2 with access to the shared the podium garden with Block A2 or alternatively, the podium garden being split in two through a landscape boundary to increase provision of amenity space and have the benefit of allowing for an additional doorstep playspace.

It is accepted that there is a tight relationship between some blocks, but this helps to bring a character to individual spaces and streets. The applicant has completed an ADF analysis that demonstrates most units will achieve minimum daylight standards and the shared podium spaces will meet sunlight/daylight requirements. However, some units do not meet minimum internal daylight standards and the design should be revised to address this.

In accordance with Policy D11 of the draft London Plan, Hounslow Council will be required to secure an informative as part of any future grant of planning permission requiring the submission of a fire statement, produced by a third party suitable qualified assessor, to be submitted to and agreed with the London Fire Brigade.

Development specification

As parts of the application are in detail and others in outline, the applicant has provided a development specification with parameter plans and design coding to secure the principles and design quality of the development. Sufficient detail has been provided to provide assurance that design quality in regards to building appearance and adopted materials will be maintained throughout the delivery of different phases. The detailed part of the application will also set a good benchmark for the remaining scheme. Notwithstanding this, the development specification should make it clear that all buildings are to meet the requirements of the Mayor of London’s Housing SPG (and not an equivalent) and that the space standards are compliant with the London Plan minimum standards as well as the Nationally Described Space Standards.
Density

38  London Plan Policy 3.4 and draft London Plan Policy D6 ‘Optimising housing density’ seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the design, as described in draft London Plan Policies D4 ‘Housing quality and standards’ and D2 ‘Delivering good design’.

39  The proposal would have a density of 643 hr/hectare and 325 units/hectare. This is above the guidance ranges in Table 3.2 of the London Plan (based on the site’s PTAL of 2/3 in a ‘urban’ setting and exceed the thresholds set by draft London Plan Policy D6 and therefore required a greater degree of design scrutiny. The proposals have been subject to CABE Design Review during pre-application development, as well as Council and GLA urban design input, and the applicant has responded positively to comments, although further adjustments have been suggested. It is noted that site access to Brentford railway station and the town centre will be improved with the delivery of the pedestrian bridge over the canal and the immediate context of the early phases of development at Brentford locks and adjacent development are of a similar density that has changed the nature of the canal setting. As discussed in this report, the proposals are of a potentially high design quality subject to some minor changes and can provide a good residential quality, and do not demonstrate issues with overdevelopment. The proposed density is therefore appropriate to its location and changing urban context.

Heritage

40  London Plan Policy 7.8 ‘Heritage Assets and Archaeology’ and Policy HC1 of the draft London Plan states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate.

41  The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” and in relation to conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area”. The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, and the more important the asset, the greater the weight should be.

42  Where the site extends across the canal, it falls within the Grand Union Canal and Boston Manor Conservation Area. This area includes the river/canal waterways and towpath, the wet dock and overhanging parts of the warehouses, the Island, Brentford Lock, and adjoining areas to the south and west. The designated area extends northwards along the canal to include Boston Manor Park. Land to the east of the river falls within The Butts Conservation Area, which protects an enclave of Georgian and Victorian townscape. Boston Manor Park is designated as Metropolitan Open Land and includes listed Boston Manor. Syon Park is also Metropolitan Open Land and a registered park/garden, and includes several listed buildings, notably Syon House. Kew Gardens are a registered park/garden and a UNESCO World Heritage Site (WHS), and include several listed buildings, notably Kew Palace and the Palm House and are located several kilometres away.

43  The applicant has provided an ES addendum that updated analysis of views and assessment compared with the original consented scheme. The only significant change in view would be from Robin Grove Recreation Ground by reason of the change in height to Block A with the building becoming more visible. Notwithstanding this, adjustments to the massing will not
change the impact on the character and appearance of the conservation area, due to mature landscaping limiting views and screening the buildings. The replacement of the northern warehouse and its integration into the new builds form retains and reinterprets the existing industrial character of the site. The addendum views also demonstrate there will be no impact on outstanding universal value of the Kew Gardens WHS and the development will have negligible/low impacts on heritage assets compared with the consented scheme.

**Access**

44 London Plan Policy 3.8 ‘Housing Choice’ and Policy D5 of the draft London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’ and 10% meets Building Regulation requirement M4(3) ‘wheelchair user dwellings’, that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The application has demonstrated that these requirements will be met and the plans identify the location of the wheelchair accessible homes. The Council should secure M4(2) and M4(3) requirements by condition. The non-residential uses have adopted inclusive design principles as has the design of the public realm.

**Playspace**

45 Children and young people need free, inclusive and accessible spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan seeks to ensure that all children and young people have access to such provision. The challenge facing boroughs and their partners in play provision will be to find opportunities to retain and increase the provision of play and informal recreation, particularly in housing developments.

46 The applicant has completed the detailed work on the child yield using the Mayor’s Shaping Neighbourhoods: Play and Recreation SPG (2012) and a play space strategy has been established for the masterplan and this is set out in reasonable detail, it identifies the following provision by age group:

- Door step playable space (0-5 years) are located within the podium courtyards of blocks A, B and D. Due to site and design constraints there is no accessible doorstep playspace for block and this is provided within in the adjacent canal square.

- Robin Grove Recreational Ground would accommodate the playspace for other age groups (5-11 and 12+ age groups).

47 There is however an overall shortfall in provision of doorstep play across the development and the applicant should explore options to increase doorstep playspace in the case Blocks B1 and B2 of the affordable units through the suggested change to allow Block B2 units access to the shared the podium garden with Block A2. It is accepted that constraints related to block C limit roof top provision, but the applicant should explore the feasibility of a doorstep space adjacent to the ground floor to the east of the building. Given the reliance on offsite provision for older age groups, the applicant should provide a commitment to enhancing existing facilities at Robin Grove Recreational Ground subject to discussion with Hounslow Council and any committed funding contribution should be secured in the s106 agreement.

**Sustainability**

48 Detailed energy and flood risk responses have been sent under a separate cover to the applicant and Hounslow Council.
Energy

49 Although the applicant has broadly followed the energy hierarchy, the carbon emissions have not been provided in line with the GLA guidance requirements, the applicant should confirm the carbon emissions presented using the guidance. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified in relation to: cooling and overheating analysis; carbon savings and need for additional energy efficiency measures; exploration of connection to an existing district energy network; centralised energy centre connecting to all phases of the development; the need for a CHP lead energy strategy and details of the CHP operation including air quality impacts; and the commitment to adopt photovoltaic panels and potential to increase the area of the array and provide assurance on the savings claimed.

50 The non-domestic buildings achieve an overall saving of 35% and meet the target set within Policy 5.2 of the London Plan. However, the domestic buildings do not achieve the zero-carbon target as required by the London Plan and draft London Plan. The applicant should therefore ensure that the remaining regulated carbon dioxide emissions, equivalent to the finalised shortfall in tonnes of per annum to be agreed, is met through a contribution to the Hounslow Council’s offset fund.

Flood risk

51 The Flood Risk Assessment provided for the proposed development does not comply with London Plan policy 5.12 (and draft New London Plan policy SI.12), as it does not give appropriate regard to the need for flood resistance and resilience measures.

52 The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 (and draft policy SI.13), as it does not give appropriate regard to the drainage hierarchy. Further details on how pervious surfaces, bioretention systems and green roofs will be included in the development should be provided. Details of exceedance flow paths through the site should also be provided.

53 The proposed development does not meet the requirements of London Plan policy 5.15 (and draft New London Plan policy SI.5) as it does not meet the water consumption targets of these policies. Further details must therefore be provided to address these points before the application is referred back to the GLA at Stage 2.

Transport

Trip generation and impact

54 The submitted transport assessment (TA) is acceptable. Although clarification on mode share is outstanding, following discussion with Hounslow Council it is agreed that no further junction modelling (above and beyond that submitted with the application) is required. The updated modelling received indicates that the Commerce Road and High Street/London Road junction would operate within capacity.

Car and cycle parking

55 A total of 164 residential car parking spaces are proposed at a ratio of 0.36 per unit. This decrease from 0.7 in the outline consent is welcomed and is in line with the draft London Plan and
has been informed by occupancy surveys which found Phase 1 car parking less used than anticipated. There would be no commercial parking and one space provided for a car club.

The blue badge parking and electric vehicle charging points are also compliant with the draft London Plan and a Framework Car Park Management Plan is included in the TA, which should be conditioned to be submitted in detail and approved prior to occupation given the shared nature of the street layout.

Commerce Road is to be improved and its entire length up to the bus depot entrance and the Phase 3 site is to be adopted. This is welcomed. Whilst the slight changes in alignment are considered acceptable, there are some detailed safety concerns for which Hounslow Council is seeking resolution and which TfL supports.

A total of 880 cycle parking spaces are to be provided broadly in accordance with the draft London Plan and London Cycle Design Standards. Showering and changing facilities for the employment and retail uses and the cycle storage should be conditioned to be retained and maintained in future for those purposes only.

Public realm, bridge and cycle network

The proposed improvements for walking and cycling on Commerce Road and within the site are welcomed. In addition, a pedestrian/cycle bridge consented in outline will span the adjacent canal from Phase 3 land over to a Council recreation ground, which is then connected by residential streets to Brentford Station about 200 metres to the north east. An acceptable bridge design has been secured and will deliver key strategic transport objectives as analysed in the TA, whilst mitigating the development’s impacts including the currently proposed densification of Phase 3.

The bridge details are in a linked non-referable application, but officers are of the opinion that given the strong linkage to the scheme proposals that detailed comment is required. Following negotiation, the applicant has now increased the width of the bridge from an inadequate 2 to 3.5 metres to meet policy and (London Cycle Design) guidance. The Metropolitan Police has raised concerns about the potential for moped crime and nuisance on a widened bridge. However, GLA and TfL officers, Hounslow Council and the applicant, whilst acknowledging this issue, agree that to physically restrict access through barriers and pinch points would restrict access for all and especially people in wheelchairs.

A wayfinding s106 contribution of £20,000 increased by indexation should be re-secured and will be particularly useful in signing the routes via the new bridge, Consultation on the Brentford to Hounslow section of CS9, which would run along the A315 High Street, is due to commence and appropriate contributions from this development may be sought, subject to further discussion between the applicant, TfL and the Council.

Construction logistics, delivery service and travel plans

The Phase 3 construction will itself be phased and a temporary depot provided on part of the site to allow bus operations to continue while the new facility is being built. However, no consideration has been given to the use of the adjacent waterway for transport of spoil and building materials. The applicant should revise its approach to construction logistics to comply with draft London Plan policies and finalised plan secured by condition.

An up-to-date Delivery and Servicing Plan is required because of the proposed shared use of the internal roads and the inadequacy of using the 2014 plan given increased home deliveries and home shopping.
A Travel Plan has been submitted with the application and is also intended to cover the earlier phases of the development, recognising that the final mix of the development would be different to that approved. It includes targets from 2014, which should be updated to reflect the Mayor’s current Transport Strategy’s targets as well as the positive shift in mode share since the original submission and should be secured by condition. The original s106 agreement also secured a welcomed package of measures to enhance opportunities for active and more sustainable travel. The submitted plan however omits reference to the provision of the new footbridge and this should be included. The applicant also needs to demonstrate that a car club operator has agreed to adding this location to their network.

Local planning authority’s position

At the pre-application stage Hounslow Council were supportive of the principle of development.

Legal considerations

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

There are no financial considerations at this stage.

Conclusion

London Plan policies on housing, urban design, inclusive design, climate change, and transport are relevant to this application. Whilst the principle of mixed use development is supported, a number of strategic concerns are raised, and consequently the application does not accord with London Plan Policy. The following could address these deficiencies:

- **Principle of development:** A mixed use development of the site is established by an extant consent and a site allocation. The proposal includes an uplift of 239 residential units which is supported by London Plan and draft London Plan policy.

- **Affordable housing:** The scheme proposes 50% affordable housing which meets the ‘Fast Track Route’ requirements in compliance with draft London Plan Policies H5, H6, and H7 and the Mayor’s Affordable Housing and Viability SPG. An early review mechanism must be secured and affordability levels confirmed.

- **Urban design and heritage:** The overall approach to the development layout, height, massing, and appearance are supported subjected to minor improvements to the residential quality and changes to the design specification. The development will not impact on the Kew Gardens WHS and will have no harm on heritage assets.
• **Children & young person’s play**: The applicant should explore options to increase the provision of accessible and safe doorstep playspace.

• **Sustainable energy**: Further work is required on the energy strategy, flood risk and surface water mitigation to confirm compliance with London Plan policy.

• **Transport**: The applicant must address issues with respect to: transport assessment, Commerce Road layout changes, construction logistics, the delivery service plan and trip generation, and the travel plan. The requested conditions should also be secured. The improved width of the proposed footbridge is supported.

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