

BskyB Osterley Campus

in the London Borough of Hounslow

planning application no. 00558/A/P43

Strategic planning application stage II referral (new powers)

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

The proposal

The application is for a hybrid application on the 13.52 hectare site:

Outline application for the demolition and/or alteration of existing buildings and structures and the development for a media broadcasting and production campus of up to 175,000 sq.m. GIA comprising office (Class B1a), studio, production and research and development facilities (Class B1b), warehouse/storage (Class B8) and retail (Class A1-A4); hard and soft landscaping; reconfigured and new vehicle and pedestrian accesses and works to the public highway; the provision of parking; and all necessary ancillary and enabling works.

Detailed application for Phase One comprising 33,616 sq.m. GIA including 426 sq.m. A3-A4; 1,000sq.m. B8; 15965 sq.m. B1(b) and 16,225 sq.m. B1 (a).

The applicant

The applicant is **BskyB** and the architect is **AL_A**

Strategic issues

The principle of this well **designed** expansion of BskyB's operation in an **Industrial Business Park** and a **Strategic Outer London Development Centre** is in line with the London Plan and the further discussion and clarification requested regarding **urban design, inclusive design, climate change** and **transport** has been provided.

The Council's decision

In this instance Hounslow Council has resolved to grant permission.

Recommendation

That Hounslow Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 24 February 2012 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. This was referred to the Mayor under Category 1B and 3F of the Schedule to the Order 2008:

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 outside Central London and with a total floorspace of more than 15,000 sq.m.

3F: Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use

2 On 22 March 2012 the Deputy Mayor acting under delegated authority considered planning report PDU/0077d/01, and subsequently advised Hounslow Council that the application generally complied with the London Plan although some further discussion and commitments were needed.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor's concerns (see below). On 26 April 2012 Hounslow Council decided that it was minded to grant planning for the revised application, and following agreement on the section 106 agreement it advised the Mayor of this decision on 31 July 2012. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Council under Article 6 to refuse the application or issue a direction to Hounslow Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 11 August to notify the Council of his decision and to issue any direction.

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.

5 The decision on this case, and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

6 At the consultation stage Hounslow Council was advised that the application generally complied with the London Plan although some further discussion and commitments are needed as set out in paragraph 89 of the Stage I report and set out below:

- **Land use principle:** this proposal which involves the consolidation, retention and expansion of jobs in this Industrial Business Park and Strategic Outer London Development Centre is welcomed and is strongly supported in London Plan policy terms.
- **Urban design:** The design approach is imaginative and singular and would give a strong and distinct identity to the site, one entirely appropriate to its function as the major base of one of the country's major broadcasters and is on the whole supported and in line with London Plan policy. Further consideration should be given to the segregation of vehicles and pedestrians on the loop road, the hierarchy of spaces around the strip buildings (particularly S1 and S2 given their prominence), how the hierarchy of routes will be

articulated, a tightening of the design code to avoid inactive ground floor frontages and the location of further active uses at ground floor in phase one.

- **Inclusive design:** Whilst the outline application and detailed phase one application appear to be designed to ensure inclusive access a gradient plan for the site showing the gradient of all public routes should be provided to confirm this.
- **Air Quality:** The impacts of the development on air quality are considered to be negligible and the development is air quality neutral and is therefore in line with London Plan policy.
- **Climate change:** The energy strategy is in line with London Plan policy however some further information is required relating to the reductions in regulation carbon dioxide emissions from renewable energy and for the cumulative effect of all measures. The application should be conditioned such that the network will be kept in perpetuity. The applicant should provide justification as to why grey water recycling is not proposed.
- **Transport:** Whilst TfL has no objection in principle to redevelopment of the site, there are a number of strategic transport issues which must be addressed, particularly modelling in respect of Gillette Corner, a contribution for improvements for pedestrians/cyclists at Gillette Corner and Syon Lane, a contribution towards the bus network, a commitment to monitoring the shuttle bus service in line with travel plan targets and a commitment to fund improvements to Syon Lane Station.

7 The following section 106 obligations are proposed:

- Public realm: £531, 695 to include street trees, plating and improving links to Brentford.
- Construction training: £1,875,000
- Training and employment initiatives: £1,141, 875
- Bus services: £575, 818
- Traffic management (CPZ if required): £180,000
- Gillette Corner junction (feasibility study/capped contribution to works): £130,000
- Syon Lane improvements: £77, 837
- Syon Lane station improvements: £ 1,051, 047
- Cycle superhighway: £100,000

8 The application is conditioned such that the overall floorspace area of all the uses shall not exceed 175,000sqm Gross Internal Area (GIA); Class B1a (offices) shall not exceed 112,330 sqm GIA; B1b (Research and development) shall not exceed 77,620 sqm GIA; B8 (Warehouse) shall not exceed 4000sqm GIA; f) A1/A2 (Retail) shall not exceed 200 sqm GIA g) A3/A4 (Leisure) shall not exceed 2290 sqm GIA.

Urban design

9 The Stage I report set out that further consideration should be given to the segregation of vehicles and pedestrians on the loop road, the hierarchy of spaces around the strip buildings (particularly S1 and S2 given their prominence), how the hierarchy of routes will be articulated, a tightening of the design code to avoid inactive ground floor frontages and the location of further active uses at ground floor in phase one.

10 Since issuing the Stage I report a number of discussions have taken place and clarifications and further information has been provided. As such GLA officers are satisfied that the design code and parameter plans provide for an appropriate hierarchy of routes and spaces and an appropriately active ground floor within the confines of the needs of the building uses.

Inclusive design

11 A gradient plan has been provided which demonstrates that where there are slopes these are shallow.

Climate change

12 At Stage I the applicant was asked to provide more information on carbon savings overall and from the renewable element. Further information has been submitted and the overall regulation carbon dioxide saving is 32% and this is welcomed. Due to the nature of the energy strategy proposed it has been accepted that it is not possible to calculate the savings from the renewable element alone.

13 The applicant sets out that rainwater harvesting is proposed but that greywater recycling has been discounted due to the low levels of water being recycled given the low water use fittings that have been specified. This is acceptable.

Transport

14 At Stage I TfL requested further justification and discussion regarding the level of car parking proposed. TfL is now satisfied that the proposed level of car parking (1,750 spaces) is in line with London Plan policy 6.13. Whilst still at the upper limit of the maximum standards, it is nevertheless acknowledged that this represents a significant reduction from the existing car parking ratio on site and that consented by the 2007 masterplan. Furthermore, the car parking management strategy prepared by the applicant demonstrates how parking will be monitored and managed over time. TfL is satisfied that this document is being secured as part of the travel plan through the section 106 agreement, and will therefore be enforced similarly.

15 Considering the hybrid nature of the planning application, the proposed conditions requiring details of parking to be provided in accordance with London Plan minimum standards for electric vehicle charging points, disabled parking and cycle parking are welcomed. A robust cycle strategy has also been secured through the section 106 agreement, and will be enforced through the travel plan. The contribution of £100,000 secured towards the development of a cycle superhighway is also welcomed.

16 The capped contribution of £130,000 offered towards a feasibility study for improvements at Gillette Corner, with any residual monies to be spent on any possible improvements identified, is acceptable. This contribution will be held by the borough, and therefore available to TfL, for up to 10 years. The applicant has agreed to TfL being fully involved in scoping and appraising the results of the feasibility study with the appointed consultant and the borough, and TfL welcomes the certainty embedded into the section 106 which reflects this.

17 TfL welcomes the contribution of £235,000 towards capacity improvements to the bus network. This can be pooled alongside an earlier payment of £340,818 which was secured from the previous masterplan and has been paid to the Council. TfL and the Council will continue to work with the applicant to identify possible route alterations on which these monies could be spent. TfL welcomes the commitment of the applicant to submit an annual shuttle bus operating strategy as part of the annual review of its travel plan, for approval by the Council/TfL. This has been reflected in the section 106 agreement and will be enforced by the Council.

18 The applicant has developed a scheme of improvements to the accessibility of Syon Lane national rail station, which has been costed at £1m. A contribution of this amount is therefore secured through the section 106 agreement.

19 Considering the above commitments, TfL is satisfied that the application complies with the transport policies of the London Plan and can therefore be supported on transport grounds.

Other comments

20 BAA Airports set out it has no aerodrome safeguarding objection provided a condition regarding a bird hazard management plan is included on the decision notice. A suitable condition has been included.

21 British Waterways set out that the application does not have any direct impact on the Grand Union canal but asked that consideration be given to a contribution to improve links to the canal and its environment.

22 The Environment Agency has no objection to the application provided suitable conditions are included on the decision notice. These have been included.

23 The Highways Agency does not object to the application but ask that potential impacts on the M4 are identified and monitored.

24 Ealing Council raises no objection to the proposal.

25 GSK (EMEA Regional Planning) raises no objection to the proposal and commented on the transport impacts of the proposal.

26 Thames Water requested drainage, piling and water infrastructure conditions be included on the decision notice. Appropriate conditions have been included.

27 Bonnington Group, owners of the adjacent Gillete Corner site, object to the application on the following grounds: lack of consultation with adjacent owners, increase in office floorspace against local policy and in an area with low public transport accessibility, construction impact, insufficient public transport improvements, insufficient utility capacity, impact of transporting biomass to the site, visual impact, commitment to extend biomass CCHP to serve the whole site and clarification that public open space will be open to the public.

28 The matter raised have been dealt with by the inclusion of conditions/section 106 agreement clauses or have been dealt with in this report, the Stage I report or the Council's committee report.

Response to consultation

29 Residents in surrounding streets were consulted on the application and press and site notices were also posted. Five representations were received from local residents. These raised objections on the grounds of height, access via Macfarlane Lane, increase in traffic, road safety, traffic congestion, impact on utilities and there should be increase in buses rather than private shuttle buses. The matters raised have been dealt with in this report, the Stage I report or the Council's committee report.

Article 7: Direction that the Mayor is to be the local planning authority

30 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage I, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

31 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He

also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

32 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

33 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

34 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

35 This proposal which involves the consolidation, retention and expansion of jobs by one of London's major employers in this Industrial Business Park and Strategic Outer London Development Centre is welcomed and is strongly supported in London Plan policy terms.

36 Further discussions, as requested at Stage I, have taken place regarding urban design, inclusive design, climate change and transport and any resulting clarifications have been provided.

37 As such the Mayor is content for Hounslow Council to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

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planning report PDU/0077d/01

22 March 2012

BskyB Osterley Campus

in the London Borough of Hounslow

planning application no. 00558/A/P43

Strategic planning application stage 1 referral (new powers)

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

The proposal

The applications are for a hybrid application on the 13.52 hectare site:

Outline application for the demolition and/or alteration of existing buildings and structures and the development for a media broadcasting and production campus of up to 175,000 sq.m. GIA comprising office (Class B1a), studio, production and research and development facilities (Class B1b), warehouse/storage (Class B8) and retail (Class A1-A4); hard and soft landscaping; reconfigured and new vehicle and pedestrian accesses and works to the public highway; the provision of parking; and all necessary ancillary and enabling works.

Detailed application for Phase One comprising 33,616 sq.m. GIA including 426 sq.m. A3-A4; 1,000sq.m. B8; 15965 sq.m. B1(b) and 16,225 sq.m. B1 (a).

The applicant

The applicant is **BskyB** and the architect is **AL_A**

Strategic issues

The principle of this well **designed** expansion of BskyB's operation in an **Industrial Business Park** and a **Strategic Outer London Development Centre** is in line with the London Plan however further discussion and clarification is needed over **urban design, inclusive design, energy, climate change adaptation and transport child playspace, noise, climate change mitigation** and **transport**.

Recommendation

That Hounslow Council be advised that while the application is generally acceptable in strategic planning terms further discussion is needed on transport and further information and commitments are needed, as set out in paragraph 89 before it can be confirmed that the application complies with the London Plan.

Context

1 On 24 February 2012 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 5 April 2012 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 is referable under Category 1B, 3F of the Schedule to the Order 2008:

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 outside Central London and with a total floorspace of more than 15,000 sq.m.

3F: Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use

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 site occupies an area of approximately 13.52 hectares near to the Great West Road and is accessed from Syon Lane via Grant Way. Syon Lane meets the A4 Great West Road, which forms part of the Transport for London Network (TLRN) 200m to the southeast, at Gillette Corner. The site can also be accessed via Harlequin Avenue, which meets the A4 at a junction which was upgraded to include a signalised crossing, two bus routes run within walking distance of the site. The H28 currently terminates at the Tesco supermarket adjacent to the site and the H91 runs along the A4 itself. The nearest rail station is Syon Lane (South West trains) which lies some 300m to the south. Osterley station (London Underground Piccadilly line) is 1.6km to the west, which is above acceptable walking standards. The Public Transport Accessibility Level (PTAL) of the site varies between 1 and 2 (out of a maximum of 6, where 6 is excellent).

7 The site is bounded to the west by Metropolitan Open Land (MOL) which is in use as playing fields by the Grasshoppers Rugby Club. To the south and south-west lies Syon Lane and Tesco superstore. The Gillette Building bounds the site on the south-east. On the east lie storage and industrial units. To the north and north-east the site is bounded by the railway line.

8 The buildings currently on the site are Sky 1-8, Athena Court, the BskyB Combined Cooling Heating and Power (CCHP) plant which is under construction, the BskyB wind turbine which is under construction and the Harrods depot.

9 Sky 5 will shortly be demolished as part of the 2007 consented masterplan. The newly built sky studios do not form part of the outline planning application site and will remain.

10 The existing buildings on the site accommodate B1b, B1a and B8 uses and range in height from one to three storeys with the exception of the Harrods distribution warehouse which is approximately 25m tall. The site also contains significant areas of parking and landscaping.

11 The site lies within an area of mainly light industrial and office development located between the M4 motorway and the Great West Road. To the west of the site is Osterley Park which is MOL and to the west and south of the site are mainly suburban residential neighbourhoods. Closest to the site is Osterley with residential properties 120m from the site boundary.

12 Immediately south-west of the site, off Syon Lane, is a Tesco superstore with surrounding areas of car parking. The stretch of the A4 Great West Road to the south and south-east of the site is known as the 'Golden Mile'. Several factories of architectural merit were built along the road following its opening in 1925. Many examples of art deco architecture remain including the Grade II listed Gillette building.

13 There are no listed buildings on the site although there are a number of listed buildings nearby. The Grand Union Canal and Boston Manor Conservation Area is also nearby.

14 Phase One currently contains the CCHP plant, the generator building and Sky 5 (which is soon to be demolished) and 237 parking spaces.

Details of the proposal

15 The applications are for a hybrid application on the 13.52 hectare site:

Outline application for the demolition and/or alteration of existing buildings and structures and the development for a media broadcasting and production campus of up to 175,000 sq.m. GIA comprising office (Class B1a), studio, production and research and development facilities (Class B1b), warehouse/storage (Class B8) and retail (Class A1-A4); hard and soft landscaping; reconfigured and new vehicle and pedestrian accesses and works to the public highway; the provision of parking; and all necessary ancillary and enabling works.

Detailed application for Phase One comprising 33,616 sq.m. GIA including 426 sq.m. A3-A4; 1,000sq.m. B8; 15965 sq.m. B1(b) and 16,225 sq.m. B1 (a).

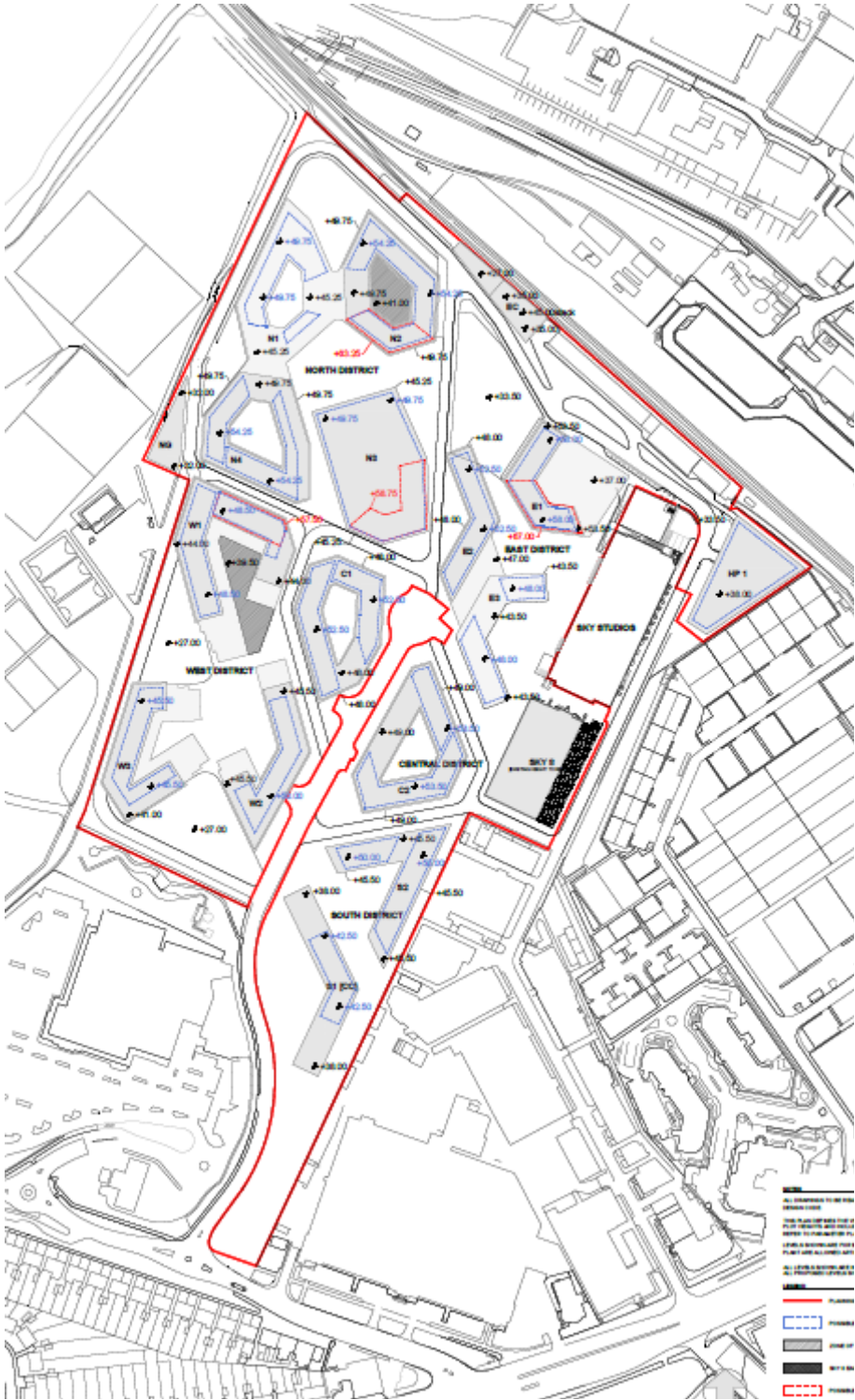
16 This development will facilitate the consolidation of Sky's operations onto one site and it is envisaged that operations from other sites will be moved onto the campus.

17 The outline application seeks approval for the principle of the development, access to the site, uses proposed within development zones are fixed, the quantum of development proposed for each use is identified within maximum and minimum limits; the approximate location of buildings, routes and open spaces are set out; and the upper and lower limit for the height, width and length of each building is set out. The detailed appearance, landscaping, layout and scale of the development will be subject to subsequent reserved matters applications.

18 A design code is submitted with the application which will guide architecture and materials. A public realm design statement has also been submitted which will inform subsequent public realm details and which sets out an indicative scheme.

19 Since Sky's original consent the business has grown substantially and its nature and needs have changed. BskyB currently employ 8,375 people in Houslow at the Osterley Campus and in

properties leased along the Great West Road. BskyB is looking to consolidate its operations and provide space to accommodate future growth. BskyB feel that there are significant advantages of bringing all its operations into one campus in terms of communicating and sharing ideas and decreasing the need to travel. BskyB anticipates that the site will accommodate approximately 12,000 employees over the next 10 years representing an increase in jobs in the order of 2,625.



Outline application

Case history

20 This proposal has been the subject of three pre-planning application meetings and was presented to the Deputy Mayor on 10 December 2011.

21 In 2007 BskyB received outline planning consent for the redevelopment of a smaller site than is the subject of this application. This site was around 8.5 hectares containing Sky 1-8 but did not include Athena Court or the Harrods Depot.

22 The proposal was for a broadcasting facility, offices and warehouse/storage uses, landscaping and 1125 car parking spaces, access and highway improvements. The approved floor area (in GEA) were as follows 29,534 sq.m. B1(a), 38,047 sq.m. B1(b) and 2,000 sq.m. B8.

23 Following the grant of consent parts of the masterplan were implemented and completed. Sky Studios is the most significant of these elements and is a mixed use media building comprising 23,299 sq.m. GEA. The demolition of Sky 5 is programmed to commence shortly. A number of conditions have also been discharged in relation to the masterplan and contributions made in line with the section 106 agreement. In particular improvement works to the junction of Harlequin Avenue and the Great West Road have been funded and completed.

24 In 2010 planning permission was received for the construction of two wind turbines located to the north of Sky studios. A second permission in 2011 amended the proposal to provide a single turbine and construction of this is underway.

25 In 2010 planning permission was received for the biomass CCHP. This is under construction.

26 In 2011 planning permission was granted for the retention of temporary B1 accommodation for use as hospitality services facilities in connection to managing visitors to live shows. Planning permission was also granted in 2011 for the erection of 23,310 sq.m. of temporary office accommodation in close proximity to Harrods depot.

Strategic planning issues and relevant policies and guidance

27 The relevant issues and corresponding policies are as follows:

- Economic development *London Plan; the Mayor's Economic Development Strategy; Employment Action Plan*
- Urban design *London Plan; PPS1*
- Mix of uses *London Plan*
- Regeneration *London Plan; the Mayor's Economic Development Strategy*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13*
- Parking *London Plan; Assembly draft Early Minor Alteration to the London Plan; the Mayor's Transport Strategy; PPG13*
- Retail/town centre uses *London Plan; PPG13, PPS4*
- Green Belt/MOL *London Plan; PPG2*
- Employment *London Plan; PPS4; Industrial Capacity SPG*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Historic Environment *London Plan; draft World Heritage Sites SPG; PPS5; Circular 07/09*
- Air quality *London Plan; Assembly draft Early Minor Alteration to the London Plan; the Mayor's Air Quality Strategy; PPS23*

- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; Mayor's Climate Change Mitigation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Sustainable Design and Construction SPG*

28 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 2003 Hounslow Unitary Development Plan and the 2011 London Plan.

29 The following are also relevant material considerations:

- The July 2011 Core Strategy preferred option document
- The Hounslow Employment DPD
- The Brentford Area Action Plan
- The Early Minor Alteration to the London Plan

Land use principle

30 The GLA Strategic database designates the site as Industrial Business Park and this appears to be endorsed in Hounslow's Employment DPD. The draft Land for Industry and Transport SPG currently out for consultation sets out in paragraph 4.5 (ii) that such areas typically include uses such as research and development. It sets out that IBP's should not be used primarily for B1(a) office development and where B1 (a) office is proposed this should not jeopardise local provision for B1(b) and (c) accommodation where there is demand for these uses or alter the existing character of the area. The office development should also comply with London Plan office policy 4.2 particularly in terms of location and public transport access.

31 The element of the site which has consent for an expansion of Sky's operation is also designated as a development within the Brentford Area Action Plan. This allows for the retention and consolidation of Sky headquarters through their intensification and redevelopment to provide high quality flexible business space to accommodate and facilitate the company's future growth on this site. GLA officers consider that it is likely that if Sky owned the additional areas which now form part of this application that these would also have included in this designation.

32 The outline application seeks approval for a maximum of 137,355 sq.m. of B1(a), 77,620 sq.m. B1(b) and 4,000 sq.m. B8. Whilst a large proportion of the uses proposed are B1(a) it is considered that given the unique nature of Sky's operation this office use is more akin to research and development. In addition there is an uplift on the B1 (b) uses currently on-site and consented in the previous application.

33 The application involves the consolidation of a number of sites in the local area and these will then be available for industrial/employment uses.

34 The applicant has undertaken a PPS4 assessment and has demonstrated that there are no other suitable sites in a town centre in the area.

35 It is also considered that this site is a Strategic Outer London Development Centre in line with London Plan policy 2.16 and delivers a specialist form of accommodation and as such its use should be developed and promoted.

36 It is understood that the retail and cafe etc uses proposed are primarily to serve the workers on this site however it is supported that some of them are available to the local community.

37 As such this proposal which involves the consolidation, retention and expansion of jobs by one of London's major employers in this Industrial Business Park and Strategic Outer London Development Centre is welcomed and is strongly supported in London Plan policy terms.

Urban design

38 Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies 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 and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).

39 The proposed development is well designed, maximising the potential of the site and creating a new type of business park that will be more vibrant and sustainable than other more conventionally laid developments of this type. The architects are commended on the amount of work done overall, in particular in their consideration of alternative building typologies, landscape strategy and character areas all which are strongly supported. Whilst all of the objectives set out in the Design and Access Statement are strongly supported, in particular the desire to create a "piece of city", there are a number of aspects in the design of the scheme that need further work and articulation. The following comments refer to these elements.

The loop road

40 The Design and Access statement outlines how the "outer loop road facilitates the proliferation of open spaces to be experienced and enjoyed on foot and by bike by a necessary removal of vehicles from the centre of the campus". There is concern that this strategy of segregating vehicular and pedestrian movement in will result in the creation of a vehicular dominated noose that prevents the development of successfully integrating with the surrounding areas in the future. Successful urban environments accommodate all modes of transport within the same space and through their design encourage behaviour that mitigate any issues that may arise. An alternative solution would be more likely to achieve the aspiration of creating a 'piece of city' and would prevent the creation of a severing ring road around the site.

The strip buildings

41 The proposed development is made up of two basic building typologies, courtyard buildings and strip buildings. The courtyard buildings create distinct courtyard spaces within them and have a clear front and back allowing back of house uses and inactive frontages to be located facing the courtyards rather than the more public facing edges which is welcomed. However, the strip buildings do not benefit from this. The front to back relationship is unclear and they do not appear to create the distinct hierarchy between spaces that the courtyard buildings do. These issues can be seen on blocks S1, S2, E2, E3, W3 and W2, but are of a particular concern on buildings S1 and S2 at the entrance to the campus.

Pedestrian movement

42 The amount of development on ground level is limited to building 'touch downs.' Whilst this approach ensures a very permeable site, the combination of the unorthodox layout results in the creation of a complex network of routes that are likely to be confusing. Whilst the designers have outlined a number of ways in which the hierarchy and legibility of routes will be communicated this remains unclear, with a number of routes flanked by primary frontages on one side and secondary frontage on the other. A clear strategy of how the hierarchy of routes will be articulated and read is required.

43 As well as issues with legibility, the quantity and complexity of routes through the scheme risks diffusing the focus of activity aspired for the primary pedestrian routes. Whilst the density of people using the area might be such that this will not be an issue, further work to illustrate this will be required.

Design Codes

44 The design codes associated with the application are detailed and thorough. However, they focus on the formal massing of buildings, materials and elevations and do not put many requirements on the ground floor layout of buildings, positioning of entrances and back of house uses, all which will be critical to the vibrancy of the environment that will be created. Further clarity and detail is required to ensure that as the development is built out, the ground floor is made active and the amount of frontage taken up by servicing uses is reduced to a minimum.

Heritage and Metropolitan Open Land (MOL) impact

45 The townscape and visual impact assessment submitted with the application demonstrates that this proposal has no strategic impact on views from the MOL or on nearby listed buildings and conservation areas. The Council should assess the local impact.

The detailed application

46 The detailed aspect of the scheme is well designed and serves as an encouraging first phase to the rest of the development. However it also strengthens the concern with regards to the amount of publicly accessible space on the ground floor, the location of servicing and the impact it will have on how these spaces are used. The 'touch downs' to the north and south of this phase are a particular concern as they are mostly taken up by service uses presenting a large amount of blank frontage to the surrounding public realm. An alternative layout where these types of uses are put either in the basement or in upper floors, and their space taken up other by inhabited uses would be preferable.

Summary

47 The design approach is imaginative and singular and would give a strong and distinct identity to the site, one entirely appropriate to its function as the major base of one of the country's major broadcasters and is on the whole supported and in line with London Plan policy. Further consideration should be given to the segregation of vehicles and pedestrians on the loop road, the hierarchy of spaces around the strip buildings (particularly S1 and S2 given their prominence), how the hierarchy of routes will be articulated, a tightening of the design code to avoid inactive ground floor frontages and the location of further active uses at ground floor in phase one.

Inclusive design

48 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

49 Whilst the outline application and detailed phase one application appear to be designed to ensure inclusive access a gradient plan for the site showing the gradient of all public routes should be provided to confirm this.

Air Quality

50 London Plan policy 7.14 sets out that development proposals should be at least air quality neutral and not lead to further deterioration of existing poor air quality.

51 The impacts of the development on air quality are considered to be negligible and the development is air quality neutral and is therefore in line with London Plan policy.

Climate change

52 The London Plan climate change policies set out in Chapter 5 collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. London Plan Policy 5.2 '*minimising carbon dioxide emissions*' sets out an energy hierarchy for assessing applications, London Plan Policy 5.3 '*Sustainable design and construction*' ensures future developments meet the highest standards of sustainable design and construction, and London Plan Policies 5.9-5.15 promote and support effective adaptation to climate change. Further detailed policies on climate change mitigation and adaptation are found throughout Chapter 5 and supplementary guidance is also given in the London Plan sustainable design and construction SPG.

Climate change mitigation

53 The overarching energy strategy provides for the provision of waste heat from the consented biomass CCHP which will be powering Sky studios. As such all the buildings will be connected in a heat network. The overall regulated carbon dioxide emissions reductions are estimated to be just under 40% which is in line with London Plan policy 5.2.

54 The application should be conditioned such that the network will be kept in perpetuity and supplied from a single heat source.

Energy efficiency

55 A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations.

56 Other features include high-efficiency lighting (together with good daylight-linked and presence detection-linked lighting controls to minimise energy used for unnecessary lighting) and use of high efficiency heat recovery devices in air-handling plant to pre-condition fresh-air streams. The applicant also proposes a building energy management system (BEMS) and individual zone control to ensure energy is used to condition spaces only when required. The demand for cooling will be minimised through a glazing system with good solar performance properties and automatic shading devices for the glazing system.

57 The development is estimated to achieve a reduction of 7.2% in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development for building E1.

58 The development is estimated to achieve a reduction of 2.1% in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development for building E2.

59 The development is estimated to achieve a reduction of 2.0% in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development for building EP.

District heating

60 The applicant is proposing to install a site heat network to serve Buildings E1 and E2 within Phase 1. The site heat network will be supplied with waste heat from a single energy centre - a biomass fired combined cooling, heat and power (CCHP) currently supplying Sky Studios. It may

also be possible to provide cooling to these two buildings by utilising waste heat in two 1.1 MW absorption chillers.

Renewable energy technologies

61 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing the following:

- Extension of the biomass combined cooling, heat and power (CCHP) network – by utilising waste heat and possibly cooling (via absorption chillers) from the existing biomass fired CCHP plant (currently serving Sky Studios) to serve buildings E1 and E2.
- The installation of 960 sq.m. of solar photovoltaic (PV) panels on the roof of Building E2 to generate approximately 63 MWh of electricity per year.

62 The applicant should indicate the reduction in regulated carbon dioxide emissions that will be achieved through this third element of the energy hierarchy.

Overall carbon savings

63 The applicant should indicate the estimated regulated carbon emissions of the development after the cumulative effect of energy efficiency measures and renewable energy has been taken into account for both phase one and the outline application. These should be compared to the baseline to determine if there is compliance with the London Plan.

Summary

64 The energy strategy is in line with London Plan policy however some further information is required relating to the reductions in regulated carbon dioxide emissions from renewable energy and for the cumulative effect of all measures.

Climate change adaptation

65 The development incorporates green roofs and increases the level of permeable surfaces as well as incorporates SUDS and this is all welcomed. It is understood that rainwater harvesting is proposed and this is welcomed. The applicant should provide justification as to why grey water recycling is not proposed.

Transport

Highway Impact

66 Whilst the transport assessment submitted as part of the application is broadly in accordance with TfL's Transport assessment best practice guidance (April 2010), the modelling information does not comply with TfL's pre-application advice or modelling guidelines. Considering the heavy reliance that vehicles using the site will place on Gillette Corner, which currently operates close to capacity, it is vital that the applicant's assessment is robust. Detailed feedback has been provided to the applicant and TfL awaits further information, required to ensure the proposed development complies with London Plan policy 6.11.

Parking

67 The development proposes 1,750 car parking spaces for the proposed 175,000 sq.m. of business floorspace, equating to 1 space per 100sqm. This level of car parking is at the maximum level usually permitted in areas of outer London, although it does represent a significant reduction in the existing parking ratio on site, which is currently 1 space per 48 sq.m. Notwithstanding this, TfL awaits further information in respect of the modelling of Gillette Corner before it can agree that this level is appropriate and consistent with the standards outlined in Policy 6.13 of the London Plan.

68 Notwithstanding this, the Car Parking Management Strategy produced by the applicant is considered to be robust. It clearly articulates how parking across the applicant's existing and future estate will be allocated and managed through construction and in the future. The applicant also makes a commitment to contribute funding towards the development of a controlled parking zone in the local area, should parking stress be identified on surrounding local roads. It also commits to introducing a permit (car parking allocation) scheme to manage the spaces should demand continue to outstrip supply. TfL expects the strategy to be secured, monitored and enforced as part of the wider travel plan, and this should be reflected in the section 106 agreement.

69 The applicant has committed to providing electric vehicle charging points and to allocating at least 5% of all spaces for blue-badge holder use. This should be secured in accordance with the London Plan standard, which requires 20% active and 10% passive provision. TfL welcomes the commitment to providing a car pool for employees, which should also be secured through the section 106 agreement.

70 As the application is in hybrid form, full details of location and level of cycle parking have not been provided. The applicant has however committed to providing levels that exceed the standards of the London Plan. This commitment should be secured through planning condition. The applicant's cycle parking strategy, which outlines targets for increasing cycle trips to/from the site and identifies measures to achieve this, is welcomed. This should be secured, monitored and enforced as part of the Travel Plan, through the section 106 agreement.

Connections at Gillette Corner

71 Both TfL and the Council have aspirations to deliver improved conditions for pedestrians and cyclists on Syon Lane and at Gillette Corner to improve connectivity. Following discussions with the applicant and Council, TfL considers it appropriate for the applicant to make a capped contribution towards the cost of a feasibility study which will explore options for improving connections on either side of Gillette Corner, with any residual amount being held by the Council to fund any improvements agreed between the Council and TfL as a result of the study. TfL expects to be a 'participating partner' with the Council and appointed consultant when agreeing the scope, methodology, validation and results of the feasibility study. The Council should be aware that proposals to improve pedestrian connections may require the acquisition of third party land which could restrict their delivery.

72 The overriding objective for TfL at Gillette Corner, as set out in London Plan Policy 6.11, is to smooth traffic flow for all modes. The proposal to add to or alter signals at the junction will require careful consideration if they are to be supported by TfL. This serves to reinforce the need for accurate and robust modelling of the junction by the applicant, as stated above. Further discussions between the applicant, the council and TfL are required in respect of the above contribution before TfL can confirm that the proposals are in accordance with London Plan Policies 6.1, 6.9, 6.10 and 6.11.

Buses

73 Of all the existing trips to the site, 2.5% are made by buses. The applicant considers that this can rise to 4.8% after development. Although TfL recognises the relative remoteness of the

site from public transport nodes, this level of bus use is below the outer London average of 10%, although TfL recognises the relative remoteness of the site from public transport nodes, and the comprehensive shuttle bus network operated by the applicant to nearby stations (see below.)

74 The additional trips generated by the development on the bus network equate to the need for an additional two services in the schedule. The cost of this is estimated at £900,000, and TfL requests that this is paid by the applicant to mitigate the impact of the development on the bus network and encourage the use of buses, in line with London Plan policy 6.1.

75 Together with the Council, TfL is currently preparing options for improving and rationalising bus services in the locality of the site. It is likely that a contribution secured from the applicant will be spent on implementing these improvements, to the benefit of the development site.

Rail and Underground

76 TfL has reviewed the trip generation and capacity analysis of rail and underground services, which is considered robust. Given that some peak hour national rail services on the Hounslow Loop have now been lengthened to 10 cars, there is likely to be sufficient capacity on these services to accommodate the additional passengers generated by the development.

77 The majority of the overground rail trips to the site are likely to use Syon Lane station, and there are currently significant queues (lasting up to 2 minutes) to egress from the westbound platform during peak hours. This is forecast to worsen and is an unacceptable delay to passengers. TfL supports the scheme, which widens the stairway and provides alternative and accessible points of access, currently being developed by the applicant in consultation with the Council and TfL. A commitment should be made through the section 106 agreement for the applicant to fund the improvements identified in the scheme.

Travel Planning

78 The applicant's travel plan has been reviewed by TfL and is considered to be robust. TfL welcomes the approach to reducing the car mode share significantly from current levels, and this is detailed further in the car parking management strategy above.

79 Sky currently has a license from TfL to operate its own shuttle bus services for use by employees (including guests). As previously stated, the site is relatively remote from the transport network and major population centres, and these shuttle buses provide a vital link to the rail stations at Osterley, Gunnersbury, Chiswick Park, Acton Town, Ealing Broadway and South Ealing. In recognising the key role that this service plays in the applicant's access strategy, and in meeting mode share targets for rail and underground, TfL considers that maintaining an adequate level of service on the shuttle buses is necessary. The section 106 agreement should therefore reflect the need to ensure that the ability of the shuttle buses to meet travel plan targets for rail trips is constantly monitored and reviewed, in line with London Plan policy 6.1. TfL is engaging with the applicant and Council in this respect.

80 A commitment to submitting a detailed construction logistics plan for approval by the council, in consultation with TfL, should be made and secured through planning condition. A delivery and servicing plan should also be secured through condition.

Summary

81 Whilst TfL has no objection in principle to redevelopment of the site, there are a number of strategic transport issues which must be addressed, particularly:

- The modelling prepared by the applicant in respect of Gillette Corner is inadequate and must be made more robust. This will assist TfL's consideration of the development's impact of traffic on the TLRN;
- A capped contribution should be paid by the applicant towards improving connections for pedestrians/cyclists at Gillette Corner and Syon Lane;
- A contribution should be paid towards the bus network;
- A commitment should be made to monitoring the shuttle bus service in line with travel plan targets;
- A commitment should be made to fund identified improvements to Syon Lane Station.

82 The applicant should continue to engage with TfL in respect of the above. TfL also wishes to be involved in the drafting of s106 obligations and planning conditions relating to transport.

Community Infrastructure Levy

83 In accordance with London Plan *policy 8.3*, the Mayor of London proposes to introduce a London-wide Community Infrastructure Levy (CIL) that will be paid by most new development in Greater London. Following consultation on both a Preliminary Draft, and then a Draft Charging Schedule, the Mayor formally submitted the charging schedule and supporting evidence to the examiner in advance of an examination in public which was held in Autumn 2011. Following examination the Mayor published the Planning Inspector's report on 31 January 2012, and subject to the legal process, the Mayor intends to start charging on **1 April 2012**. Any development that receives planning permission after that date will have to pay, including:

- Cases where a planning application was submitted before 1 April 2012, but not approved by then.
- Cases where a borough makes a resolution to grant planning permission before 1 April 2012 but does not formally issue the decision notice until after that date (to allow a section 106 agreement to be signed or referral to the Secretary of State or the Mayor, for example).

84 The Mayor is proposing to arrange boroughs into three charging bands with rates of £50 / £35 / £20 per square metre of net increase in floor space respectively (see table, below). The proposed development is within the London Borough of Hounslow where the proposed Mayoral charge is £35 per square metre. More details are available via the GLA website <http://london.gov.uk/>.

85 Within London both the Mayor and boroughs are able to introduce CIL charges and therefore two distinct CIL charges may be applied to development in future. At the present time, borough CIL charges for Redbridge and Wandsworth are the most advanced. The Mayor's CIL will contribute towards the funding of Crossrail.

Mayoral CIL charging zones Zone	London boroughs	Rates (£/sq. m.)
1	Camden, City of London, City of Westminster, Hammersmith and Fulham, Islington, Kensington and Chelsea, Richmond-upon-Thames, Wandsworth	£50
2	Barnet, Brent, Bromley, Ealing, Greenwich, Hackney, Haringey, Harrow, Hillingdon, Hounslow, Kingston upon	£35

	Thames, Lambeth, Lewisham, Merton, Redbridge, Southwark, Tower Hamlets	
3	Barking and Dagenham, Bexley, Croydon, Enfield, Havering, Newham, Sutton, Waltham Forest	£20

Local planning authority's position

86 It is understood that Hounslow Council planning officers intend to report this application to its committee on 29 March 2012 with a positive recommendation.

Legal considerations

87 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

88 There are no financial considerations at this stage.

Conclusion

89 London Plan policies on land use principle, employment, urban design, heritage, inclusive design, air quality, climate change transport are relevant to this application. In general, the application complies with these policies although some further discussion and commitments are needed:

- **Land use principle:** this proposal which involves the consolidation, retention and expansion of jobs in this Industrial Business Park and Strategic Outer London Development Centre is welcomed and is strongly supported in London Plan policy terms.
- **Urban design:** The design approach is imaginative and singular and would give a strong and distinct identity to the site, one entirely appropriate to its function as the major base of one of the country's major broadcasters and is on the whole supported and in line with London Plan policy. Further consideration should be given to the segregation of vehicles and pedestrians on the loop road, the hierarchy of spaces around the strip buildings (particularly S1 and S2 given their prominence), how the hierarchy of routes will be articulated, a tightening of the design code to avoid inactive ground floor frontages and the location of further active uses at ground floor in phase one.
- **Inclusive design:** Whilst the outline application and detailed phase one application appear to be designed to ensure inclusive access a gradient plan for the site showing the gradient of all public routes should be provided to confirm this.

- **Air Quality:** The impacts of the development on air quality are considered to be negligible and the development is air quality neutral and is therefore in line with London Plan policy.
- **Climate change:** The energy strategy is in line with London Plan policy however some further information is required relating to the reductions in regulation carbon dioxide emissions from renewable energy and for the cumulative effect of all measures. The application should be conditioned such that the network will be kept in perpetuity. The applicant should provide justification as to why grey water recycling is not proposed.
- **Transport:** Whilst TfL has no objection in principle to redevelopment of the site, there are a number of strategic transport issues which must be addressed, particularly modelling in respect of Gillette Corner, a contribution for improvements for pedestrians/cyclists at Gillette Corner and Syon Lane, a contribution towards the bus network, a commitment to monitoring the shuttle bus service in line with travel plan targets and a commitment to fund improvements to Syon Lane Station.

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