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Park Road, Syon Park Appeal Statement of Case

LPA ref: 00707/E/P120

Northumberland Estates

April 2022

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1.0 Introduction and overview

1.1 This Statement of Case has been prepared by Lichfields on behalf of Northumberland Estates (the appellant), who owns the Park Road allotments, Park Road, Isleworth, TW8 8JF (the appeal site).

1.2 The appeal is made pursuant to Section 78 of the Town and Country Planning Act 1990, against the decision of the London Borough of Hounslow to refuse planning permission on 22 October 2021 (ref. 00707/ E/P120 or P/2020/4292) for:

“Erection of 80 residential dwellings, concierge building, car and cycle parking, landscaping and associated works; and infrastructure and other structures associated with allotment use.”

1.3 The development if approved, will generate an annual income to fund important heritage repairs at Syon House, within the appellant’s ownership. Syon House is a nationally significant Grade I listed building.

1.4 Much was agreed with officers during determination of the application and the application was reported to the Planning Committee on 14 October 2021 with a recommendation for approvals with the Committee Report recognising the benefits of the proposed development notably the heritage benefits to Syon House and high quality design. Nevertheless, the application was refused by the Planning Committee against officer recommendation. The reasons for refusal as stated on the decision notice are:

- 1 *“It is considered that, due to the inappropriate location of the development on designated Local Open Space, the proposal would result in the loss of and the failure to protect and enhance the designated Local Open Space which would not be replaced by equivalent or better provision in a suitable location, contrary to Local Plan (2015) policy GB2 and London Plan (2021) Policy G4 coupled with the requirements of the National Planning Policy Framework 2021.”*
- 2 *“The proposed development would, in the absence of a completed legal agreement to secure necessary planning obligations, fail to secure the repair and restoration of the heritage assets, fail to provide construction training, fail to secure necessary highway works and fail to secure the provision of a comprehensive travel plan for the development, thereby failing to assist in limiting the use of the private car and contributing to the use of more sustainable modes of transport. This would be contrary to adopted Local Plan (2015) policy IMP3 and London Plan (2021) Policy DF1 coupled with the requirements of the National Planning Policy Framework 2021.”*

1.5 This Statement of Case will demonstrate that contrary to the reasons for refusal the proposed development is acceptable in planning terms by virtue of:

- The proposed allotments amounting to equivalent or better provision compared to existing as required by Local Plan Policy GB2; and
- The loss of allotment land from the residential development in conflict with London Plan Policy G4 being outweighed by the significant public benefits which are material considerations.

- The provision of a Unilateral Undertaking that will reflect the planning obligations sought in reason for refusal 2.

1.6 Accordingly, the appellant will demonstrate that material considerations in the form of planning benefits indicate that planning permission should be granted in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

2.0 **Background to appeal proposal**

2.1 This appeal relates to a full planning application submitted to the London Borough of Hounslow by Northumberland Estates on 8 December 2020. The description of development states:

“Erection of 80 residential dwellings, concierge building, car and cycle parking, landscaping and associated works; and infrastructure and other structures associated with allotment use.”

2.2 The site comprises 1.17ha of non-statutory allotment plots and is roughly triangular in shape. It is bounded by Park Road on its north eastern and eastern boundary, Snowy Fielder Way on its north western boundary, the gardens of properties on Church Street on its south western boundary, and the churchyard of All Saints Church on its southern boundary. It is immediately opposite the entrance to the Syon Park Estate, which contains the Grade I listed Syon House, the Grade I Registered Park and Garden and other listed buildings. The site is within the Isleworth Riverside Conservation Area.

2.3 A full description of the site and its surroundings is provided in the application Planning Statement and Design and Access Statement.

Relevant planning history

2.4 There is an intricate planning history to the site over recent years.

2.5 A planning application for the redevelopment of the site was submitted on 15 February 2016 (ref. P/2016/0717). The scheme would deliver 127 high quality Build to Rent dwellings consisting of a mix of apartments and houses across the site. The description of development was:

“Erection of eight blocks or three- and four storey- buildings to create 119 flats and eight houses with car parking at basement and street level and associated works.”

2.6 A parallel planning application was submitted for the re-provision of the allotment gardens within the grounds of Syon Park (ref. P/2016/0716).

2.7 The applications were reported to Planning Committee on 22 June 2017 with a recommendation for approval. Members resolved to refuse both applications and the decision notices were issued on 6 July 2017.

2.8 The reasons for refusal for the residential scheme on the appeal site related to: the loss of Local Open Space; the excessively dense and out of character development failing to preserve or enhance the setting or character and appearance of the site and Isleworth Riverside Conservation Area; excessive car parking provision; lack of affordable housing; the proposal not being appropriate enabling development to secure the future of the heritage asset and therefore the benefits of the proposal for enabling development would not outweigh the disbenefits associated with the proposal; and the absence of a legal agreement.

2.9 Northumberland Estates submitted appeals against the refusal of permission to The Planning Inspectorate on 21 December 2017 (references APP/F5540/W/17/3192092 and APP/F5540/W/17/3129086 respectively). As part of the appeal process, Northumberland

Estates worked closely with London Borough of Hounslow (LBH) officers to reach agreement on environmental and technical matters to narrow the areas of difference. These were reported in the agreed Statement of Common Grounds submitted during the appeal. Accordingly, the matters relevant to the appeal comprised the loss of Local Open Space (reason for refusal 1) and whether the development would harm the character and appearance of the area and whether it would preserve or enhance Isleworth Riverside Conservation Area (reason for refusal 2).

- 2.10 The appeals were dismissed on 29 November 2018. The residential scheme was dismissed on the grounds that the scheme would result in the loss of Local Open Space without its replacement by equivalent or better allotments. A copy of the Inspector's Report is provided at Appendix 1. The scheme was considered acceptable on design and conservation grounds.
- 2.11 This planning history establishes that subject to justifying the loss of Local Open Space on site, an acceptable scheme is possible in all other regards.

Description of proposal

- 2.12 A full description of the scheme proposals is set out in the application Design and Access Statement, including Landscape Strategy, and Planning Statement.
- 2.13 In short, the application comprises residential development on the northern part of the site for 80 new Build to Rent (BtR) apartments and duplexes ranging in size from studio to three bed as set out at Table 2.1. Of the 80 homes proposed:
- 32 homes (40% by unit and 43% by habitable room) would be affordable at a split of 41% London Living Rent and 59% Discounted Market Rent.
 - An additional 30 homes would be secured by the Chelsea and Westminster NHS Foundation Trust to provide key worker housing for West Middlesex University Hospital.

Table 2.1 Application housing mix

Unit size	Market	Affordable housing		Key worker housing	Total
		LLR	DMR		
Studio	1	-	-	-	1
1 bed	11	1	10	3	25
2 bed	6	10	3	24	43
3 bed	-	2	6	3	11
Total	18	13	19	30	80

- 2.14 The homes would be provided across six blocks ranging from two to three storeys in height with an additional concierge building provided at the centre of the scheme to be accessible for all. The proposed density is 98 units per hectare (or 287 habitable rooms per hectare, 177 bedrooms per hectare, or 335 bed spaces per hectare). The new homes will be arranged around generous landscaped communal gardens accessible to all residents with playable landscape for children. Other key features of the residential scheme include:

- Creation of a new vehicle access from Snowy Fielder Way via a tree lined crescent, referred to as Church Walk, from which vehicles will enter and exit (except for emergency and larger vehicles which will continue to exit via Park Road). Church Walk will improve legibility and permeability within the local area.
- Car and cycle parking in accordance with planning policy requirements.
- Off-site landscaping improvements, including: a new pavement on the eastern site of Snowy Fielder Way with buffer planting; improvements to the driveway to All Saints Church car park (accessed from the existing Park Road entrance to the site) with associated landscape and biodiversity enhancements; and additional boundary planting on Park Road.

2.15 The southern part of the site would be retained in allotment use. 38 plots measuring 60sqm in area are proposed in an 'informal arrangement' with plots varying in shapes, arranged around a looped path. Each plot would have its own shed. A communal community building would be provided with amenity space at the new entrance from Snowy Fielder Way marked by a feature archway. Children's play space would be provided within the allotments for allotment holders family and guests. A dedicated compost area would be created and rainwater butts would be provided to provide a secondary water supply. A disabled parking space would be provided at the entrance on Snowy Fielder Way and four cycle parking spaces would be provided at the main entrance and the secondary entrance from Church Walk.

2.16 The proposed scheme was informed by pre-application advice from LBH as well as public consultation as set out in the Statement of Community Involvement, submitted as part of the planning application.

Application overview

2.17 The planning application submission comprised:

- 1 Completed application form;
- 2 Community Infrastructure Levy Form;
- 3 Application drawings, prepared by PTE and Farrer Huxley;
- 4 Planning Statement, prepared by Lichfields (including LLD Monitoring);
- 5 Design and Access Statement, including landscaping report and fire strategy, prepared by Pollard Thomas Edwards (PTE) and Farrer Huxley;
- 6 Urban Greening Factor report, prepared by Farrer Huxley;
- 7 Statement of Community Involvement, prepared by Lichfields;
- 8 Heritage, Townscape and Visual Impact Assessment, prepared by Lichfields;
- 9 Daylight, Sunlight and Overshadowing Assessment, prepared by Lichfields;
- 10 Rapid Health Impact Assessment, prepared by Lichfields;
- 11 Transport Assessment, prepared by Caneparo Associates;
- 12 Residential Travel Plan, prepared by Caneparo Associates;

- 13 Delivery and Servicing Plan, prepared by Caneparo Associates;
- 14 Outline Construction Logistics Plan, prepared by Caneparo Associates;
- 15 Energy and Sustainability Statement, including Overheating Risk Assessment, prepared by Etude;
- 16 GLA Carbon Emission Reporting Spreadsheet, prepared by Etude;
- 17 Flood Risk Assessment and Drainage Strategy, prepared by Heyne Tillet Steel;
- 18 Ecological Impact Assessment, prepared by Ecosa;
- 19 Arboricultural Report, including tree survey, prepared by Greenspace Ecological Solutions;
- 20 Air Quality Assessment, prepared by Jomas;
- 21 Geo-environmental and Geotechnical Assessment (Ground Investigation) Report, prepared by Jomas;
- 22 Noise Assessment, prepared by Acoustic Plus;
- 23 Construction Method Statement, prepared by Bluesky Building;
- 24 Historic Environment Assessment, prepared by MOLA;
- 25 Archaeological Evaluation Report, prepared by AOC Archaeology; and
- 26 Written Scheme of Investigation, prepared by AOC Archaeology.

2.18 At submission, the scheme proposed 35% affordable housing, this meeting the London Plan Fast Track requirements; however Hounslow required a viability assessment for validation which was submitted on 7 January 2021. The application was validated on 8 January 2021.

2.19 Copies of all the application documents are included with the appeal.

2.20 In response to officer and statutory consultee comments, the following amendments were made during determination.

Table 2.2 Amendments to scheme during determination

Scheme changes	Date submitted
Enhancement of allotment entrance arch. Relocation of solar panels on roof of Block E to southern elevation. Reconfiguration of gate to Block G in response to comments on potential anti-social behaviour. Revised arrangement of allotment parking space in response to highways officer comments and associated extension of the public footpath. Introduction of cages for main bicycles to be stored in the basement in response to the Designing Out Crime Officer's (DOCO) comments. Addition of CCTV within the gallery spaces in response to DOCO comments. Additional 3D visual of scheme looking east along Church Walk.	23 April 2021
Revised affordable housing offer proposing 40% by unit (43% by habitable room).	6 July 2021
Amendments to refuse strategy and associated changes to stair core and cycle parking between Blocks A, B and C.	9 August 2021

Scheme changes	Date submitted
Updated plans to correct inconsistencies of Block E solar panels. Clean elevations (with hatching removed).	9 September 2021
Additional solar panels on Block E2. Cycle parking added at allotment entrance (where had been removed erroneously). Correction to add divider between Flat F.01 and F.02 amenity space.	24 September 2021

2.21

Table 2.3 sets out the additional and amended documents submitted alongside the scheme amendments during determination.

Table 2.3 Additional and revised documents submitted during determination

Documents	Date submitted
Briefing Note – Park Road (ref. P2020/4292): Response to officer comments (dated 23 April 2021). Amended Daylight and Sunlight DD Analysis to supersede Appendix 6 of the submission version. Transport Note on revised trip generation (dated March 2021). Swept path analysis (ref. TR004) (dated 18.03.2021). Amended drawings. Updated Air Quality Assessment (V3, dated 26 February 2021) and schedule of response to Environmental Health officer comments.	23 April 2021
Additional CGI view of allotments entrance.	17 May 2021
Updated Flood Risk Assessment (rev. 2, June 2021).	11 June 2021
Acoustic Note - Response to Environmental Health officer comments (dated 16 June 2021).	2 July 2021
Briefing Note – Park Road, Syon Park (ref. P/2020/4292): Affordable housing proposal (dated 6 July 2021).	6 July 2021
Revised refuse arrangement - amended drawings.	20 July 2021
Revised refuse arrangement - amended drawings.	9 August 2021
Updated proposed Heads of Terms for legal agreement and Press and Starkey Schedule of Works, dated August 2018. Updated Air Quality Assessment (V5, dated 09 August 2021) and schedule of response to Environmental Health officer comments.	11 August 2021
Updated Flood Risk Assessment (rev. 3, August 2021).	12 August 2021
Financial Viability Assessment Report – Addendum (dated August 2021) Letter from West Middlesex Hospital on Key Worker Housing (and appendix) (dated 24 August 2021) Northumberland Estates letter on Key Worker housing, dated 26 August 2021	28 August 2021
Updated plans to show the solar panels on Block E consistently across all plans and to provide clean elevations. Detailed accommodation schedule. Tenure plan.	9 September 2021
Response to case officer queries on PVs, window U values, Block F privacy, private amenity space, children’s play space, cycle parking, tree retention and Greenfield run off rates.	21 September 2021

Documents	Date submitted
Allotment use surveys. Statement from Northumberland Estates on rationale for development Creating a natural landscape, additional pages to Stage 3 Report (dated November 2020). Feasibility cost estimate (rev G), dated 23 September 2020.	
Updated Energy and Sustainability Statement (rev C, dated September 2021).	23 September 2021
Updated Flood Risk Assessment (rev 05, dated September 2021). Amended drawings.	24 September 2021
Updated Air Quality Assessment (V5, dated 27 September 2021) and air quality comments applicant responses (dated 24 September 2021).	30 September 2021
Email dated 20 August 2021 setting out the latest position on the hotel S106 and letter confirming discharge of Hotel S106 planning obligations, dated 1 September 2021. Additional information – tree sizes	1 October 2021

2.22

Consultation comments were received from the following statutory consultees:

- 1 LBH Environmental Health
- 2 LBH Highways
- 3 Lead Local Flood Authority
- 4 LBH Waste
- 5 LBH Design and Conservation
- 6 Design out Crime Officer
- 7 Environment Agency
- 8 Historic England – Greater London Archaeological Advisory Service (GLAAS)
- 9 Heathrow Safeguarding
- 10 National Air Traffic Service (NATS) Safeguarding
- 11 London Fire Brigade
- 12 Thames Water
- 13 Natural Grid (Cadent Gas Ltd)
- 14 Chelsea and Westminster Hospital NHS Foundation Trust

2.23

The appellant was advised by the case officer that public objections to the application had been received from local members of the public and local amenity groups. A copy of the objections was not shared with the appellant during determination. According to the Committee Report, 924 objections and 1 representation of support were received from members of the public. 14 objections were received from local amenity groups.

3.0 **Basis of assessment**

3.1 This section sets out the basis of the assessment of the proposal including a review of the legislative context and the national, regional and local planning policy context and guidance that is relevant to the determination of this appeal.

Legislative context

3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

3.3 *“If regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.*

3.4 The Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) provides specific protection for buildings and areas of special architectural or historic interest. Section 72 states that when exercising planning functions the decision maker has a duty to pay special attention to *“the desirability of preserving or enhancing the character or appearance”* of Conservation Areas.

3.5 This represents the statutory basis for assessment of proposals within Conservation Areas.

Statutory Development Plan

3.6 The statutory development plan relevant to the appeal site comprises:

- 1 The London Plan (2021)
- 2 London Borough of Hounslow (LBH) Local Plan (2015)
- 3 West London Waste Plan (2015)

3.7 The West London Waste Plan is not relevant to the appeal scheme.

3.8 The site is subject to the following planning policy designations:

- 1 Designated Local Open Space
- 2 Isleworth Riverside Conservation Area
- 3 Archaeological Priority Zone

3.9 The site is to the south of Syon Park which is a Grade I Registered Park and Garden and contains several Grade I and Grade II listed buildings. All Saints Church is a Grade II* listed building and is located to the south of the site. It is close to the Royal Botanic Gardens, Kew World Heritage Site Buffer Zone.

3.10 The planning policies relevant to the determination of this appeal are below and copies are provided in Appendix 2.

LBH Local Plan

- 1 Policy CC1 Context and Character
- 2 Policy CC2 Urban design and Architecture
- 3 Policy CC4 Heritage
- 4 Policy EC2 Developing a sustainable local transport network
- 5 Policy EQ1 Energy and carbon reduction

- 6 Policy EQ2 Sustainable design and construction
- 7 Policy EQ3 Flood Risk and surface water management
- 8 Policy EQ4 Air Quality
- 9 Policy EQ5 Noise
- 10 Policy EQ7 Sustainable Waste Management
- 11 Policy EQ8 Contamination
- 12 Policy GB2 Local Open Space
- 13 Policy GB4 The Green Infrastructure Network
- 14 Policy GB7 Biodiversity
- 15 Policy GB8 Allotments, Agriculture and Local Food Growing
- 16 Policy CI3 Health facilities and healthy places
- 17 Policy SC1 Housing Growth
- 18 Policy SC2 Maximising the Provision of Affordable Housing
- 19 Policy SC3 Meeting the need for a mix of housing size and type
- 20 Policy SC4 Scale and density of new housing development
- 21 Policy SC5 Ensuring suitable internal and external space

London Plan

- 1 Policy D3 Optimising site capacity through the design-led approach
- 2 Policy D4 Delivering good design
- 3 Policy D6 Housing quality and standards
- 4 Policy D7 Accessible housing
- 5 Policy D12 Fire Safety
- 6 Policy D14 Noise
- 7 Policy H1 Increasing housing supply
- 8 Policy H10 Housing size mix
- 9 Policy H11 Build to Rent
- 10 Policy S1 Developing London's social infrastructure
- 11 Policy S2 Health and social care facilities
- 12 Policy S4 Play and informal recreation
- 13 Policy HC1 Heritage conservation and growth
- 14 Policy HC2 World Heritage Sites
- 15 Policy G4 Open Space
- 16 Policy G5 Urban greening
- 17 Policy G6 Biodiversity and access to nature
- 18 Policy G8 Food Growing
- 19 Policy SI1 Improving air quality
- 20 Policy SI7 Reducing waste and supporting the circular economy

- 21 Policy SI4 Managing heat risk
- 22 Policy SI12 Flood risk management
- 23 Policy SI13 Sustainable drainage
- 24 Policy T2 Healthy streets
- 25 Policy T4 Assessing and mitigating transport impacts
- 26 Policy T5 Cycling
- 27 Policy T6 Car parking

Other material considerations

3.11 Other material considerations include policy and guidance contained within national planning policy and guidance and other supplementary documents, including:

- 1 National Planning Policy Framework (2021)
- 2 LBH Air Quality SPD (2008)
- 3 LBH Refuse and Recycling SPD (2019)
- 4 GLA Housing SPG (2016)
- 5 GLA Affordable Housing and Viability SPG (2017)
- 6 GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- 7 GLA Energy Assessment Guidance (2020)

3.12 LBH is in the process of preparing a Local Plan Review which consists of:

- Draft Great West Corridor Local Plan Review
- Draft West of Borough Local Plan Review
- Draft Hounslow Site Allocations

3.13 The Local Plan Review is currently subject to examination. The appeal site is not within the Great West Corridor or West of Borough areas and is not a proposed site allocation.

3.14 The following documents are evidence base to the Local Plan Review and are material considerations:

- Allotment Strategy 2020-2025 (2020)
- LBH Draft Open Space Study (2018)
- LBH Local Plan Reviews: Open Spaces Background Paper (2020)

Policy issues relevant to consideration of this appeal

3.15 Several policy matters are relevant to a consideration of this appeal and as evidenced by the reasons for refusal much has been agreed between the appellant and Council during determination of the application. The remaining areas of difference relate to the loss of Local Open Space as a result of the appeal scheme and associated with this, whether:

- The proposed allotments amount to equivalent or better provision compared to existing as required by Local Plan Policy GB2; and

- The loss of allotment land from the residential development is outweighed by the significant public benefits which are material considerations.

3.16 All other matters have been agreed through the determination of the application, namely that the scheme is acceptable with respect to:

- 1 Housing mix, including affordable housing provision and key worker housing;
- 2 Design and appearance;
- 3 Preservation of the character and appearance of the Conservation Area;
- 4 Sustainability;
- 5 Quality of accommodation for future occupiers;
- 6 Fire safety;
- 7 Residential amenity;
- 8 Impact on highways and parking;
- 9 Noise impact;
- 10 Air quality;
- 11 Trees;
- 12 Ecology;
- 13 Flood risk and drainage;
- 14 Contamination;
- 15 Waste management; and
- 16 Health impacts.

4.0 Grounds of appeal

4.1 This section will examine the reasons for refusal which reflect the limited areas of difference and provide an assessment against the relevant planning policies in the statutory development plan and the NPPF. As recognised at paragraph 8.1 of the Committee Report (see Appendix 3), *“the proposal is broadly compliant with the statutory development plan”* and the area of difference between the parties is whether the loss of designated Local Open Space is justified in this case (reason for refusal 1). The absence of a legal agreement (reason for refusal 2) will be rectified as part of the appeal proceedings.

Reason or refusal 1: Loss of Local Open Space

4.2 The first reason for refusal relates to the loss of designated Local Open Space as a result of the development and states:

“It is considered that, due to the inappropriate location of the development on designated Local Open Space, the proposal would result in the loss of and the failure to protect and enhance the designated Local Open Space which would not be replaced by equivalent or better provision in a suitable location, contrary to Local Plan (2015) policy GB2 and London Plan (2021) policy G4 coupled with the requirements of the National Planning Policy Framework 2021.”

4.3 Local Plan Policy GB2 seeks to protect existing Local Open Space from development, and expects development proposals to:

- (g) Protect existing Local Open Space from development, especially where it would lead to a deficiency in publicly accessible open space, unless it satisfies the criteria for such development in the NPPF in that: it has been assessed as clearly surplus to requirements; or it would be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreational provision, the need for which clearly outweighs the loss;
- (h) Avoid the loss of or encroachment upon Local Open Space, or intrusion into an open aspect. Development ancillary to the open space use must preserve its predominantly open character; and
- (i) Enhance the provision of publicly accessible Local Open Space in the Borough, especially in areas of open space deficiency as identified on an annual basis through Annual Monitoring Reports. Major developments should achieve this through onsite provision wherever possible, particularly in areas of substantial change and intensification.

4.4 London Plan Policy G4 states that development proposals should not result in the loss of protected open space and should create areas of publicly accessible open space.

4.5 As mentioned, the licenses to the allotments expired in September 2021 and access has only been permitted for late harvest, which has now completed, since this time.

4.6 The loss of Local Open Space relates only to the northern portion of the site for proposed residential use, which equates to 0.81ha or 71% of the existing site area¹. The southern part

¹ It should be noted that the appeal site area includes areas of highways land outside the existing allotments site. Accordingly, the percentage calculations in relation to the existing allotments should be calculated using a site area of 1.17ha (rather than total appeal site area of 1.3ha) which was used to calculate the reduction in Committee Report paragraph 7.29.

of the site (29% of existing site coverage) would be retained in allotment use. In relation to Local Plan Policy GB2, it is accepted and agreed with the Council that the appeal site is not surplus to requirements. However, it is the appellants case that the scheme to re-provide the allotment land in the south of the site is considered to present equivalent or better provision in a suitable location, as required by the exception criteria in Local Plan Policy GB2. This is for the following reasons:

- 1 A total of 38 plots will be provided measuring 60sqm in area. This will replace the number of plots on the existing site on a numerical like-for-like basis. It presents an area equivalent to that under cultivation in the period 2016 to 2020 as evidenced in the 'Park Road Allotments – Survey 2017-2021' submitted during the course of the application. The smaller allotment size responds to feedback provided in Hounslow's Allotment Strategy 2020-2025 (available at Appendix 4) which recognises that a larger plot size can be a barrier to those looking to take on an allotment and the Committee Report paragraph 7.31 notes that the Council allotment officers has confirmed that the allotment plots are usable and appropriate as a starter plot for beginners.
- 2 A new community building will be provided with electricity for allotment holders to socialise. This will include the provision of tables and chairs in an associated amenity space adjacent to the community building. No such facility is available at the existing allotments and so presents a betterment.
- 3 Each plot will be provided with a shed which is at least equivalent to the existing situation where most allotment holders have sheds and an improvement where they don't. In addition to this, a communal storage space will also be provided adjacent to the community building which is a betterment.
- 4 Composting was previously an issue on the site as there was no agreed location or management. Accordingly, in response to feedback from allotment holders, a dedicated compost area will be provided. This presents a better facility than the existing arrangement.
- 5 Rainwater harvesting will be provided in the form of rainwater butts to present a secondary form of water supply in addition to, and independent from, the existing water supply. This is in line with objective 1B of the Allotment Strategy.
- 6 Where plots are not suitable for cultivation, it is proposed to provide 'wild plots' which will be used for amenity space, wildlife and playable landscape. The playable landscape for children of allotment holders (or visitors) presents an enhancement from existing provision (this will be in addition to the play space within the residential scheme to the north).
- 7 Existing fruit trees will be transplanted (where possible) to the allotment holders new plot, in response to feedback from allotment holders. In addition, several existing trees and tree groups on site will be removed to avoid shade and other implications on the growing areas. These existing trees render parts of some plots unsuitable for cultivation and so their removal presents a better quality of provision compared to existing.
- 8 The boundary treatment to the existing allotments is in a poor state of repair in some locations and so the site has poor security. The proposed scheme includes new brick walls and timber fencing to improve security of the allotments, which in turn is in line with objective 1E in the Allotment Strategy. Security has been a major problem in the past including incidences of theft and arson. This therefore presents a betterment.
- 9 The scheme would provide improved allotment land by virtue of improved soil conditions and removal of existing contamination. The Ground Investigation Report

recommends that a suitable thickness of certified clean topsoil will be required for areas of soft landscaping and allotments, which will be implemented.

- 10 Due to the location on the site of the existing allotments, travel distances for allotment holders will remain as existing. However, accessibility measures at the site will be improved. A dedicated disabled car parking space will be provided adjacent to the new main entrance from Snowy Fielder Waye and formal cycle parking provision in the form of Sheffield Stands is proposed at both entrances to the allotments. The main entrance will include a larger gate for vehicles to enable access for deliveries and maintenance associated with the allotment land. The formal cycle parking provision and vehicle access is an improvement compared to the existing arrangement.
- 11 The allotment licenses expired in September 2021 and the allotments are no longer operational. Nor is there any proposal outwith the appeal application for any allotment use to continue in the future. In this context, the appeal scheme would provide access to the allotments for allotment holders and their friends and family; an improvement compared to the current situation on site. In addition, certainty of long-term use in the future would be secured with a period of 50 years to be secured by Unilateral Undertaking.

4.7 It is therefore the appellants case that the appeal scheme presents equivalent or better provision of allotments in the south of the site in place of the allotment land lost as a result of the residential development in the north. Accordingly, the appeal scheme complies with Local Plan Policy GB2.

4.8 It is accepted that the appeal scheme would conflict with London Plan Policy G4 which protects against the loss of Local Open Space. The appellant considers that the weight afforded to this harm should be limited because:

- 1 There will be no loss of recreational amenity value. The allotments are not currently operational and so offer no recreational amenity to the allotment holders at this time. In any case, the allotments would be re-provided in the southern part of the site and so this form of value would be retained (albeit in a smaller space) by the appeal scheme.
- 2 There will be no loss of publicly accessible Local Open Space. When operational, the allotments were only accessible to allotment holders and their friends and family, which limited the public benefit to these members of the local community only. As the allotments are no longer operational, there is no public access to the site. The appeal scheme will restore the limited form of public access provided by the existing site in terms of access to allotment holders, friends and family, and will expand this to new residents who will be able to access the communal gardens in the northern part of the site. It should also be noted that the site is located within an area where there is no deficiency of overall open space or public open space. This is recognised at Committee Report paragraph 7.25 and is considered in detail in the submitted Health Impact Assessment (paragraph 4.21 and Figure 4.6) which explains that there are several formal and informal open spaces within a short walking distance of the site including Isleworth Village Green, Silverhall Open Space and Syon Park, the latter of which is immediately opposite the site.
- 3 The visual amenity value of the existing allotments will not be lost as a result of the development. The southern part of the site will be retained as allotments. The northern residential scheme will sit within a generous communal garden of 2,800sqm. The positioning of the buildings will provide substantial gaps and combined with the metal

railings will enable a high level of openness to exist on the northern part of the site (as recognised by officers in the Committee Report at paragraph 7.92. Moreover, the additional boundary tree planting along Park Road which will maintain the leafy and green character of the site.

4.9 This harm arising from conflict with policy due to development in the northern part of the site should be balanced against the substantial public and heritage benefits arising from the scheme, namely:

- 1 Securing the long term future of the allotments in a new facility with improved amenities. The Committee Report (paragraph 7.26) refers to the demand for allotment space in the Brentford and Isleworth area and gives weight to this demand at paragraph 7.27 as ‘merited’. Correspondingly, the benefit from securing the long term future of the allotments should also be given weight. The existing allotments were non-statutory and could be closed at any time, as they now have been. In the context of the now closed allotments, the appellant considers this should be given significant weight.
- 2 Delivering new high quality homes for the Build to Rent market and widening the housing offer available in this area. In line with the inquiry Inspector’s decision (paragraph 61), this should be afforded significant weight.
- 3 Delivering 32 much needed affordable and 30 key worker Build to Rent homes to be secured by legal agreement, the latter in conjunction with the adjacent Middlesex University Hospital. This carries significant weight.
- 4 Creating a new revenue stream for the restoration works of the Grade I Listed Syon House and wider Syon Estate, including the Grade I Registered Park and Garden. The NPPF states that great weight should be given to an asset’s conservation and the more important the asset, the greater the weight should be (paragraph 199). Grade I heritage assets are of national importance. Significant weight should therefore be afforded to this benefit. It should be noted that the Committee Report refers at paragraph 7.111 to the revenue stream being used to fund and expedite works secured by the hotel S106 (planning permission ref. 00707/E/P93). This is incorrect and the works to be funded by the appeal scheme would be in addition to those secured in the hotel S106.
- 5 An overall positive design contribution which will preserve and enhance the Conservation Area. The appellant considers that this carries significant weight in favour of the appeal scheme, having regard to the duty placed upon the decision maker to pay special attention to “*the desirability of preserving or enhancing the character or appearance*” of Conservation Areas under Section 72 of the Act. This is in line with the inquiry Inspector’s Report.
- 6 Delivering a high quality new thoroughfare from Snowy Fielder Way to All Saints Church and the Isleworth riverside which will improve legibility and permeability within the local area. The Hounslow Urban Context and Character Study (2014) recognises that “*a network or minor paths allows limited pedestrian permeability through the study area’s large open spaces.*” The appeal scheme would therefore contribute to addressing this and therefore carries weight in favour of the scheme.
- 7 Removing a vehicle access from Park Road which has been identified as a highways benefit, due to visibility constraints of the existing access. This carries significant weight in line with the Highways Officer’s consultation comments (available at Appendix 5) which recognise that consolidating vehicle movements to the Snowy

Fielder Way access is preferable in terms of highways safety and pedestrian movement along Park Road².

- 8 De-contamination of the site, including improved soil conditions for the new allotment plots through the introduction of a clean topsoil to mitigate the lead and polyaromatic hydrocarbons found on site likely resulting from years of pesticide and herbicide use. This presents a benefit of the scheme to the health of the allotment users and carries some weight.
- 9 Improvements to the driveway to the All Saints Church car park, including resurfacing, landscaping and biodiversity improvements. This is considered to carry moderate weight in favour of the appeal scheme.
- 10 Biodiversity net gain through wildlife enhancement measures.

4.10 The appellant also draws the Inspector's attention to the Local Plan Site Allocations Review document currently at examination. This identifies two of the Council's own allotment sites for development in the Local Plan Review Site Allocations under site ref 45 'Land at Green Lane' and 89 'Land at James Street'. An Open Space Background Paper 2020 (see Appendix 6) forms part of the evidence base to the Local Plan Review and justifies the release of the sites for development on the basis that the allotments are non-statutory, have been unused for some time, and the reintroduction of allotments (alongside a third allotment site) would lead to a surplus within the 'analysis area' based on an analysis of waiting lists. The same conclusion that these sites are surplus would not be drawn based on an analysis of the National Allotment Society's recommended average of 20 plots per 1,000 households used in the Allotment Strategy to analyse local provision. This shows that whilst Hounslow Centre (where James Street allotments) currently has 26 plots per 1,000 population, Hounslow West where 'Land at Green Lane' is located has no allotment sites within the ward. The Site Allocations Review is at an advanced stage of examination and therefore carries weight in the determination of applications.

4.11 In the context of the National Allotment Society recommendation, Isleworth ward (where the appeal site is located) has 28 plots per 1,000 household (excluding consideration of the allotments at the appeal site) and a similar case could therefore be made on this basis that the appeal site is surplus to requirements. The emerging site allocations are a material consideration and show that there are similar circumstances elsewhere in the borough where the Council has accepted the loss of Local Open Space in allotment use on Council owned sites in favour of development. Similar circumstances and justification is evident at the appeal site. Indeed, with the appeal proposals 38 new allotment spaces are created and an equivalent area to that cultivated in the period 2017-21 is provided. Moreover, there is little prospect of allotment use or wider community benefits being delivered outwith the appeal proposals, with the land being managed in connection with Syon Park operations.

4.12 In summary, it is the appellant's view that the adverse impacts arising from the loss of Local Open Space and the conflict with policy is outweighed by the public and heritage benefits resulting from the appeal scheme. In addition, notwithstanding our position at paragraph 4.7, should the Inspector come to a different view that the scheme conflicts with Local Plan Policy GB2, it is considered that the identified benefits from the scheme at paragraph 4.9 also outweigh any harm arising from this conflict with this policy as outlined above. These

² The consultation comments request that the Park Road access is removed unless it is demonstrated that refuse vehicles cannot exit via Snowy Fielder Way. This was responded to in the Response to Officer Comments Briefing Note submitted on 23 April 2021.

benefits are considered to present material considerations that indicate planning permission should be granted.

Reason for refusal 2: Legal agreement

4.13

Reason for refusal no. 6 relates to an absence of a completed legal agreement. The appellant will provide a certified copy of a Unilateral Undertaking within 7 weeks from the start date of the appeal as required by the Procedural Guidance. This will incorporate the planning obligations agreed during the course of determination and outlined in paragraph 7.299 of the Committee Report. This comprises:

- 1 Restoration works to Syon House and Syon Park through the ongoing revenue of the development.
- 2 To carry out the works in accordance with the programme in a period not exceeding 20 years following first occupation of the development.
- 3 Affordable housing early and late stage reviews.
- 4 Securing 30 residential homes for key workers on a long lease.
- 5 Securing the use of the allotments for a minimum period of 50 years.
- 6 A Management and Maintenance Plan for the allotments.
- 7 Residential Travel Plan.
- 8 A public right of way for pedestrians and cyclists through the site between Snowy Fielder Way and Park Road that follows the east-west road.
- 9 Future residents to be made ineligible for parking permits for Controlled Parking Zones (CPZs) in the area.
- 10 Financial contributions to consult existing residents on potential introduction/extension of a CPZ (£3,000) and to enact any changes following CPZ consultation (£12,000). If the consultation concludes in no change to the CPZ, a clause would enable the £12,000 to be spent on active travel improvements in the vicinity.
- 11 Highway works (works to be undertaken under a Section 278 agreement including accesses) agreed prior to commencement and works completed prior to occupation of the development. This would comprise new/amended vehicle access to Park Road and Snowy Fielder Way and the construction of a footway along the eastern side of Snowy Fielder Way.
- 12 Strict management and monitoring of the access from Park Road.
- 13 Construction Training – onsite or contribution (£2,750 per £1m construction cost) £59,455.
- 14 Carbon Offset Fund Contribution of £61,275³.
- 15 Considerate Contractor Scheme.
- 16 Travel Plan monitoring £2,318.40.

³ As confirmed in the Supplement Addendum Report to the Committee Report.

- 4.14 The planning obligations are considered to meet the statutory tests set out in Part 11 of the Community Infrastructure Levy Regulations 2010 insofar as they are necessary to make the development acceptable in planning terms, they directly relate to the development and they fairly and reasonably relate in scale and kind to the development. The benefits secured through the agreement are material and weigh significantly in favour of the appeal.

5.0 **Matters of agreement**

- 5.1 This section provides an assessment of the matters relevant to the appeal scheme that were considered by the Council to be acceptable and are therefore considered agreed matters. This is reflected in the commentary contained within the Committee Report and relevant sections are referenced below.

Allotments

- 5.2 The site was partly still in use as allotment gardens and London Plan Policy G8 and Local Plan Policy GB8 expect development proposals to retain allotments. The proposed scheme will consolidate and re-provide the allotments in the southern part of the site, albeit in a smaller area than existing. The allotments will therefore be retained in line with policy.

Housing

- 5.3 The proposed development will deliver 80 new Build to Rent (BtR) homes, including 32 affordable homes (40%) in the form of Discounted Market Rent.
- 5.4 London Plan Policy H1 sets Hounslow's 10 year housing target as 17,820 (1,782 per annum). Local Plan Policy SC1 seeks to maximise the supply of additional housing in the borough in a manner that is consistent with sustainable development principles, and ensure it is built at a rate of that will meet the London Plan annual completion targets for the relevant period. With respect to BtR homes specifically, the London Plan encourages boroughs to take a positive approach to the BtR sector and recognises that BtR developments can make a positive contribution to increasing housing supply (supporting text paragraph 4.11.1).
- 5.5 Policy at all levels acknowledges the significant role that BtR must play in delivering London's housing need and the proposed development would contribute towards this, meeting the needs within a market sector which is recognised as important. This represents a significant planning benefit in the context of the increasing housing need in Hounslow and London more widely.

Affordable housing

- 5.6 The appeal scheme will deliver 32 affordable homes comprising 13 homes at London Living Rent Levels and 19 at Discounted Market Rent levels.
- 5.7 London Plan Policy H11 sets out that the affordable offer for BtR schemes can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. The policy goes on to state that where at least 35% affordable housing is proposed the application can follow the Fast Track Route and where this is not met applications much follow the Viability Tested Route. Local Plan Policy SC2 states that Hounslow will maximise the provision of affordable mixed tenure housing on development sites and requires developments to provide an appropriate mix of both housing size and tenure.
- 5.8 Despite the original application submission proposing 35% affordable provision (by unit), the Council required a viability assessment to be submitted. During the course of the

application, the affordable offer was improved to propose 40% by unit. The appeal scheme includes affordable housing provision that will make a positive contribution to Hounslow's affordable housing targets. The appeal scheme therefore accords with policy in terms of affordable provision and is a substantial benefit of the scheme.

Housing mix

- 5.9 The proposed development meets relevant housing and space standards as required by local and regional policy.
- 5.10 The proposed housing mix is set out in Table 2.1 of this Statement and includes a mix of 1, 2 and 3 bedroom homes and one market studio unit, in the form of apartments and duplexes. London Plan Policy H10 requires that schemes should consist of a range of sizes having regard to robust local evidence, the nature and location of the site and the need for additional family housing alongside the role of one and two bed units in freeing up existing family housing. Local Plan Policy SC3 seeks to secure a mix of new housing types, sizes and tenures across the borough to meet local need, using the mix provided in Table SC3.1 of the Local Plan as a starting point.
- 5.11 The proposed housing mix broadly reflects the mix agreed as part of the inquiry process, albeit with a slightly higher proportion of three bed units, and had regard to the Hounslow Strategic Housing Market Assessment (SHMA, 2018). The housing mix is considered acceptable in accordance with policy and as reflected at paragraph 7.56 of the Committee Report.
- 5.12 Moreover, London Plan Policy D7 and Local Plan Policy SC5 require that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10% to be designed as adaptable to wheelchair users (to meet Building Regulation requirement M4(3)). In accordance with these requirements, a total of 8 wheelchair user dwellings are to be provided comprising a mix of one and two bed units, all of which will be on a single level, equating to 10% of the total units. The remaining 90% of units will meet the requirements of M4(2) 'accessible and adaptable' dwellings.
- 5.13 The proposed housing mix is compliant with planning policy and as recognised in the Committee Report is a suitable housing mix that *"would help to deliver mixed and inclusive neighbourhoods whilst also providing an acceptable level of wheelchair accessible homes. Therefore, the proposal is considered to comply with the NPPF (2021), London Plan (2021) policies H4, H6, H10 and D7 and Local Plan (2015) policies SC2 and SC3"* (paragraphs 7.60-7.61).

Key worker housing

- 5.14 The appellant has agreed with Chelsea and Westminster Hospital NHS Foundation Trust to provide 30 units as much needed key worker accommodation for the key workers at West Middlesex University Hospital (adjacent to the appeal site). These homes are in addition to the affordable housing provision. As identified by the hospital in its letters to the Council (see Appendix 7) fit for purpose key worker housing is in very short supply in the area. The proposed key worker housing would be provided on a long lease to the hospital which would be secured by the legal agreement. Accordingly, the provision of key worker homes is a significant benefit of the scheme.

Design and appearance

- 5.15 The NPPF attaches great importance to the design of the built environment stating that good design a key aspect of sustainable development. London Plan Policy D3 requires high quality design that responds to existing character and Policy D4 sets out requirements for the delivery of good design. At the local level, Local Plan Policy CC1 seeks to ensure proposals have due regard to the Urban Context and Character Study (2014) and demonstrate how the proposal responds to the design recommendations for each character area. Local Plan Policy CC2 seeks to promote and support high quality urban design and architecture to create attractive, distinctive, and liveable places.
- 5.16 In relation to design matters, the inquiry Inspector was unequivocal that *“the scheme is well designed, taking its design cues from local buildings, has a good delineation between private and shared open space, would be well landscaped and would be built of high quality materials appropriate for the area.”* The proposed scheme has drawn from the positive design elements of the appeal scheme that the Inspector considered acceptable and carried these forwards to deliver a high quality scheme that complements the character of the area. Examples of this include, proposed building heights up to three storeys with dormer accommodation with taller buildings located in the north and centre of the site stepping down in height to the lower existing buildings on Snowy Fielder Way; designing the blocks to be experienced as gables in the trees when viewed from Park Road rather than continuous buildings frontage; and drawing inspiration from surrounding architectural features to influence the appearance of the buildings including replicating garden walls with arch features that reflect the arches at All Saints Church to the south. A condition will secure details of materials.
- 5.17 Overall the scale, massing, design and appearance of the appeal scheme is considered acceptable and in compliance with regional and local policy, as confirmed at paragraph 7.83 of the Committee Report.

Heritage

- 5.18 NPPF paragraph 197 requires that in determining applications local planning authorities should take account of desirability of new development making a positive contribution to local character and distinctiveness. London Plan Policy HC1 requires developments affecting heritage assets and their settings to conserve their significance, avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. Local Plan Policy CC4 requires development within a Conservation Area to preserve or enhance its character and appearance.
- 5.19 The Inspector’s Report established that the inquiry scheme would preserve the character and appearance of the Isleworth Riverside Conservation Area. This is a material consideration and starting point for an assessment of this appeal scheme. The Inspector identified one impact on the Conservation Area from one of the buildings blocking a glimpsed view of All Saints Church tower from Park Road. The layout and form of the blocks in the appeal scheme have been designed to retain the glimpsed views of the All Saints Church Spire from Park Road during winter months, thus addressing the previous impact identified.

- 5.20 A Heritage, Townscape and Visual Impact Assessment was submitted with the application which assessed the scheme with respect to the potential impact on the Conservation Area; nearby listed buildings including All Saints Church (Grade II*) to the south; Syon Park Registered Park and Garden; and the Royal Botanic Gardens, Kew World Heritage Site. As reflected in the Committee Report, the appeal scheme would not harm the significance of setting of All Saints Church (paragraph 7.100), improve the setting of the listed boundary wall at Syon Park (paragraph 7.101), improve the setting of Syon Park Registered Park and Garden (paragraph 7.102); and have neutral impact on the World Heritage Site (paragraph 7.103). As concluded at paragraph 7.105 of the Committee Report *“the proposal would preserve the character and appearance of the IRCA [Isleworth Riverside Conservation Area], as well as preserving the settings of the surrounding listed buildings and other heritage assets.”* The appeal scheme therefore complies with the requirements of the NPPF, London Plan and Local Plan. Having had regard to the statutory tests, the development will preserve the setting of the nearby listed buildings and will preserve and enhance the character and appearance of the Conservation Area
- 5.21 With respect to archaeology, London Plan Policy HC1 requires developments to identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Local Plan Policy CC4 requires development proposals located within or adjacent to Archaeological Priority Areas to be supported by an archaeological evaluation. The policy expects regard to be had to any harm to, or loss of, the significance of a non-designated heritage asset (including Archaeological Priority Areas), from both direct and indirect effects. A Historic Environment Assessment accompanied the application which draws upon the Archaeological Evaluation Report (AER) and Written Scheme of Investigation prepared by AOC Archaeology in 2016. It identified potential archaeological resources on site and the impacts to this can be appropriately mitigated through the implementation of a programme of archaeological investigation as secured by an appropriate archaeology condition as recommended by Historic England (Condition 3 of the Committee Report).

Sustainability

- 5.22 The proposed development will contribute to minimising the contribution to climate change by delivering an energy efficient building and utilising sustainable drainage measures.
- 5.23 London Plan Policy SI2 requires major developments to be net zero carbon, meaning reducing carbon dioxide greenhouse gas emissions from construction and operation in line with the energy hierarchy ‘be lean’, ‘be clean’, ‘be green’ and ‘be seen’. A minimum on site reduction of at least 35% beyond Building Regulations is required with 10% in residential schemes achieved through energy efficiency measures. Any shortfall should be provided through a cash in lieu contribution. Policy SI4 requires that major schemes demonstrate how they will reduce the potential for internal overheating. Local Plan Policy EQ1 requires developers to take measures to reduce carbon emissions in accordance with the requirements set by the London Plan. Policy EC2 encourages sustainable design and construction expecting development proposals to incorporate principles include passive solar design, water efficiency standards, re-use and recycling of materials, green roofs and urban greening.

- 5.24 An Energy and Sustainability Statement accompanied the application. This was amended during determination to increase the on-site carbon reduction through the repositioning and increase of solar panels on site and change to the window U value in response to consultation comments. This demonstrated an on-site reduction in emissions of 78% below baseline with 19% achieved through energy efficient measures in accordance with the London Plan requirements. The remaining carbon emissions will be offset via a financial contribution to be secured via legal agreement.
- 5.25 In line with the requirements of London Plan Policy SI4 an Overheating Risk Assessment has been completed by Etude which concludes that the new homes are at low risk of overheating, subject to windows being openable for purge ventilation or the use of a Mechanical Ventilation with Heat Recovery system.
- 5.26 The scheme therefore complies with regional and local policy in terms of sustainability and this is confirmed in the Committee Report at paragraph 7.133.

Quality of accommodation for future occupiers

- 5.27 All homes meet the minimum internal space standards set by London Plan Policy D6 and Local Plan Policy SC5. The layout and massing maximises dual aspect units with 93% of units dual aspect and single aspect homes consisting of 1 bed units in Block F none of which face north and all of which have a good level of daylight and sunlight. The scheme is therefore in line with Housing SPG Standard 29, which requires the number of single aspect dwellings to be minimised and to be avoided for units facing north or with three or more bedrooms, and Local Plan Policy CC2. The scheme is also compliant with the Housing SPG with respect to the number of homes accessed via each core.
- 5.28 Furthermore, the development is considered to be acceptable in terms of outlook, defensible space and privacy in accordance with London Plan Policy D3 and Local Plan Policy CC2 subject to a condition requiring details of privacy screens to balconies and obscured glazed windows. Private amenity space would be provided in the form of private gardens, decks or balconies and complies with the requirements of the Housing SPG, London Plan Policy D6 and Local Plan Policy SC5.
- 5.29 In addition, communal amenity space in the form of communal gardens will be provided measuring a total of 2,800sqm accessible to all residents and also includes 896sqm of children's playspace. Local Plan Policy SC5 sets out the requirements for communal amenity space and for the appeal scheme requires 1,367sqm. The communal amenity space, with the children's playspace deducted, would exceed this policy requirement.
- 5.30 The approach to the play strategy is to provide playable landscape whereby informal play opportunities are integrated within the communal amenity space so that it provides natural play elements for children but is also usable space for residents generally. An example of this is the orchard in the north east corner of the site and introducing playable edges to the amenity space. The playspace would be provided in the north of the communal gardens, in a safe and secure location, overlooked by the proposed new homes in accordance with London Plan Policy S4. The Shaping Neighbourhoods: Play and Informal Recreation SPG sets a benchmark of 10sqm of useable play space per child, with under-fives children's play space provided on-site as a minimum. Using the GLA's Play Space calculator, the development is anticipated to generate a child yield of 54.2, giving rise to a requirement for 542.1 sqm of play space. The proposed onsite playspace therefore exceeds the policy requirement.

5.31 With respect to the residential amenity of future occupiers, London Plan Policy D6 and Local Plan Policies SC4 and CC2 require enough daylight and sunlight to be provided that is appropriate to the site context whilst overshadowing should be avoided. A Daylight, Sunlight and Overshadowing Assessment accompanied the planning application. It concluded that the majority of the proposed residential units across the development will experience high levels of interior daylight and acceptable sunlight conditions. In relation to overshadowing, the assessment states that the amenity space across the development will together experience a lit area in excess of BRE guide levels.

5.32 Overall the appeal scheme is considered to be acceptable with regard to the quality of accommodation for future occupiers and this is confirmed in the Committee Report which states at paragraph 7.176 that *“subject to the recommended conditions, the proposal is considered to provide suitable accommodation and complies with the Nationally described space standards (2015), the London Plan (2021), the Local Plan (2015) policies SC5 and EQ5 and The GLA’s Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).”*

Fire safety

5.33 London Plan Policy D12 requires developments to contribute to the minimisation of potential physical risks, including those arising as a result of fire and requires all major development proposals to be submitted with a Fire Statement. The original application was submitted prior to the adoption of the London Plan; nevertheless a section on fire safety was provided in the Design and Access Statement (section 3.7). This sets out the fire strategy with respect to means of egress, active and passive fire systems, firefighting access and dry rising mains. The London Fire Brigade were consulted and confirmed that the strategy is acceptable. The scheme therefore complies with London Plan Policy D12.

Residential amenity of adjoining properties

5.34 The appeal scheme is considered to be acceptable in terms of potential impacts on the amenity neighbouring properties and meets all policy requirements in this regard.

5.35 London Plan Policy D6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, daylight/sunlight and overshadowing. This is reiterated by Local Plan Policy CC2. The Daylight, Sunlight and Overshadowing Assessment accompanying the planning application concluded that neighbouring properties, including those on Snowy Fielder Way, Park Road and Charlotte House care home, will experience appropriate levels of natural light with the development in place in accordance with policy.

5.36 In addition, the layout and massing of the development has been carefully designed to provide adequate separation distances between the proposed development and existing properties to maintain the privacy and outlook of neighbouring residents, as required by London Plan Policy D6 and Local Plan Policy CC2, and recognised at Committee Report paragraphs 205 and 207.

Highways matters and parking

5.37 The proposed development is considered to be acceptable with respect to highways matters. London Plan Policy T4 requires that impacts on transport network capacity are assessed at

the local, network-wide and strategic level. Local Plan Policy EC2 is consistent with the London Plan Policy and requires a Travel Plan is submitted for developments that are likely to have a significant impact on transport.

5.38 A Transport Assessment accompanied the application and concluded that the development would generate a very low number of trips across the transport network during peak hour periods. The anticipated number of trips would not be noticeable to other road users and will have a negligible effect on the operation of the local walking, cycling and public transport networks once the trips have been distributed across the networks. An updated trip generation was undertaken during determination in response to comments from the Hounslow Highways Officer, and confirmed that the development is not expected to have a significant impact on the local highways network in line with policy.

5.39 With respect to access arrangements, the appeal scheme includes a new access from Snowy Fielder Way and the existing access from Park Road will be retained only for larger vehicles, such as emergency and refuse vehicles. Hounslow's Highways officer requested that the access from Park Road was removed altogether as an improvement in terms of highways safety and pedestrian movement along Park Road. This was investigated by the appellant's transport consultants; however there would be insufficient space to accommodate a turning circle on site for refuse vehicles to access and egress from Snowy Fielder Way. The proposed new access via Snowy Fielder Way presents an improved arrangement compared to the existing access onto Park Road and a highways benefits in terms of improving highways safety.

5.40 The following documents would be secured by planning condition or legal agreement to ensure that the development complies with policy and is acceptable in these respects:

- Residential Travel Plan
- Deliveries and Servicing Plan
- Construction Logistics Plan
- Construction Environmental Management Plan

Healthy Streets

5.41 London Plan Policy T2 requires that development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets indicators, reduce the dominance of vehicles and be permeable by foot and cycle. The Healthy Streets Approach has been placed at the centre of the development proposals and each route has been assessed against this in the Active Travel Route Assessment provided at section 6 of the Transport Assessment. In addition, a range of improvements to the local transport network have been identified and are included within the development proposal to encourage walking and cycling. These measures will be secured by planning condition and planning obligation as relevant, and as such the development complies with London Plan Policy T2.

Car and cycle parking

5.42 The appeal scheme includes car and cycle parking provision in accordance with standards set in London Plan policies T6 and T7 and required by Local Plan Policy EC2. The positioning and design of cycle parking at basement level and Block G were amended

during determination to respond to comments from Hounslow Highways Officers and the Designing Out Crime Officer. The car and cycle parking provision for the residential scheme would be secured by condition as reported in the Committee Report (Condition 18, 19 22 and 24). A Parking Management Plan would also be secured by condition for details of allocating and controlling parking on site. Moreover, it is proposed that new residents would be ineligible to apply for parking permits to existing or proposed CPZs. As referenced at paragraph 4.13, this will be secured by legal agreement alongside obligations related to potential changes to the CPZ.

- 5.43 In addition, 4 cycle parking spaces will be provided for the allotments, one of which will be suitable to cater for a courier / adapted bicycle, and an accessible parking space will be provided adjacent to the allotments main entrance on Snowy Fielder Way.

Noise impact

- 5.44 The appeal scheme complies with relevant planning policy with respect to noise and potential impacts on the future occupiers and adjacent properties. London Plan Policy D14 which requires developments to reduce, manage and mitigate noise by avoiding adverse noise impacts, mitigate and minimise existing and potential adverse noise impacts, and improve the acoustic environment. Local Plan Policy EQ5 reflects regional and national policy, and seeks to reduce the impact of noise from transport and noise-generating uses, and requires the location and design of new development to have considered the impact of noise, and mitigation of these impacts, on new users and surrounding uses according to their sensitivity.
- 5.45 A Noise Impact Assessment accompanied the original application and was updated during determination to respond to comments from the Environmental Health officer. As stated at Committee Report paragraph 7.152, the proposed development is considered acceptable with respect to noise for future occupiers subject to appropriate mitigation measures to private and communal amenity areas being secured by condition. In addition, with respect to potential impacts on existing properties, the proposed development is considered acceptable given the separation distances from existing properties and subject to a condition restricting plant noise levels. In terms of construction stage, hours of construction will be controlled by condition ensure construction noise does not detrimentally impact residential amenity. Subject to the recommended conditions, the proposed development will comply with policy with respect to noise impacts on existing and future residents.

Air quality

- 5.46 The site is within the Air Quality Management Area (AQMA) that covers the whole Borough and by definition suffers from poor air quality. London Plan Policy SI1 requires that proposals do not create new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality. Local Plan Policy EQ4 seeks to address and reduce the potential air quality impact of development and promote improved air quality conditions across the borough in line with the Air Quality Action Plan.
- 5.47 An Air Quality Assessment accompanied the planning application to assess both the construction and operational impacts of the proposed development, namely dust emissions during construction and road traffic exhaust emissions from vehicles from the site during

operation. This was amended during determination to respond to comments from the Environmental Health officer and accordingly the development is acceptable in air quality terms as reflected in the Committee Report (paragraph 7.247).

Contamination

- 5.48 A Geo-environmental and Geotechnical Ground Investigations Report accompanied the planning application and concluded that subject to the mitigation measures, the development will ensure that contamination on the site will be appropriately remediated and will not spread. Accordingly, the proposed development complies with Local Plan Policy EQ8 which requires that contamination is properly considered, and remediation of land is promoted where development comes forward. This is reflected at paragraph 7.250 of the Committee Report.

Flood risk and drainage

- 5.49 The appeal site is located within Flood Zone 3 with most of the site benefiting from flood defences, except for a narrow strip in the centre of the site. London Plan policies SI12 and SI13 set out requirements for flood risk management and sustainable drainage respectively. Local Plan Policy EQ3 requires development to be located appropriately and incorporate any necessary flood resistance and resilience measures.
- 5.50 A Flood Risk Assessment and SUDs Strategy Report accompanied the planning application. As the proposed development falls in defended Flood Zone 3a and is classified as “More Vulnerable”, an Exception Test is provided to justify the proposed land use in addition to the Sequential Test. The proposed development is acceptable in these respects. In response to pre-application advice from the Environment Agency, all sleeping accommodation on site is above 5.94m AOD, the ‘safe flood zone’. Blocks E and F are located at 5.95m AOD above the ‘safe flood zone’ and so sleeping accommodation is shown at ground floor. Blocks A, B, C and G are below the ‘safe flood zone’ and so all ground floor units in these blocks are proposed to be duplexes with sleeping accommodation at first floor. In addition, the proposed drainage strategy confirms with the SUDs hierarchy in the London Plan and will ensure that the proposed development will not lead to increased flood risk on site or to surrounding areas in compliance with regional and local policy. A condition will secure a detailed drainage scheme for the site.
- 5.51 The Flood Risk Assessment was amended during determination in response to comments from the Lead Local Flood Authority (LLFA). Following this, the LLFA confirmed the scheme is acceptable in flood risk terms and the Environment Agency also raised no objections. The proposed development therefore is compliant with policy and acceptable with respect to flood risk as confirmed at Committee Report paragraphs 7.260 and 7.263.

Ecology

- 5.52 London Plan Policy G5 requires major developments to contribute to the greening of London and sets a target score of 0.4 for predominantly residential developments. London Plan Policy G6 requires developments to manage impacts in biodiversity to secure biodiversity net gains. At the local level, Local Plan Policy GB7 confirms that the Council will protect and improve the quality of the Borough’s biodiversity. Development will only be

permitted where it can be shown that the significant adverse impact on biodiversity is avoided, mitigated or compensated.

- 5.53 In accordance with Local Plan Policy GB7, an Ecological Impact Assessment accompanied the application. This assesses the impacts of the proposed development on the site's ecological features. The site is assessed as having suitability to support roosting bats, foraging and commuting bats, foraging badgers, nesting birds, terrestrial invertebrates and European hedgehog which are identified as having local ecological value. A series of mitigation and enhancement measures are set out in the Ecological Impact Assessment and would be secured via an Ecological Management Plan condition and Ecological Watching Brief. An Urban Greening Factor Report also accompanied the application which confirmed that the scheme could demonstrate an Urban Greening Factor of 0.41, details of which would be secured via the Ecological Management Plan.
- 5.54 Accordingly, on the basis of the above, the development complies with the London Plan and Local Plan with respect to ecology and biodiversity, as confirmed at Committee Report paragraph 7.284.

Trees

- 5.55 The existing site is characterised by boundary trees along Park Road and contains trees within the existing allotments, including some fruit trees. London Plan Policy G7 requires that proposals should ensure that, where possible, existing trees of value are retained and where tree removal is necessary adequate replacement planting should be provided alongside new tree planting. Similarly, Local Plan Policies GB4 and GB7 encourage the incorporation of green infrastructure, including trees.
- 5.56 A total of 22 individual trees and ten groups of trees will be removed to enable the proposed development. An Arboricultural Impact Assessment and Method Statement accompanied the application and confirmed that no Category A trees would be removed and set out tree protection measures for the trees to be retained. In addition, 71 replacement trees are proposed of appropriate species including street trees, feature trees, communal garden trees and fruit trees. These would be located within the residential landscaping scheme due to the desire to limit tree cover within the allotments which would have implications on growing conditions. Notwithstanding the appellant commits to transplanting fruit trees to new allotment plots where practicable.
- 5.57 Accordingly, the proposed development would adequately mitigate the removal of existing trees and plant additional trees in accordance with the London Plan and Local Plan and would be acceptable as confirmed at Committee Report paragraph 7.289.

Waste management

- 5.58 Details of the proposed refuse and recycling strategy are provided on drawing reference PAR-PTE-ZZ-00-DR-A-99703-C. This provides for separate collection of dry recyclables and food in accordance with London Plan Policy SI7. In addition, the quantum and arrangement of waste and recycling provision accords with Local Plan Policy EQ7. Accordingly, as recognised at Committee Report paragraph 7.291, the development complies with the relevant policies.

Health impacts

- 5.59 One of the six Good Growth objectives of the London Plan includes creating a healthy city (GG3) and required development proposals to assess the potential impacts on the mental and physical health and well-being of communities using Health Impact Assessments. Local Plan Policy CI3 expects proposals to contribute to the health and well-being of the local community where possible and use the outcomes of Health Impact Assessment to mitigate negative impacts.
- 5.60 A Health Impact Assessment accompanied the planning application and concluded that overall the development is expected to have a slight beneficial impact (commensurate to the size of the development) on the health of the priority groups and the overall community in the neighbourhood and wider area. The positive health outcomes are linked to the provision of new, high-quality residential accommodation across a variety of sizes and tenures together with public realm improvements, the improvement of permeability for pedestrians and cyclists in the area and the retention of allotment space within the site. The loss of Local Open Space in this context is considered to have a neutral impact on existing residents as the existing allotments are not accessible to the wider local community and there are several other formal and informal open spaces within a short walking distance. Accordingly, the proposed development complies with the London Plan and Local Plan Policy CI3.

Response to third party objections

- 5.61 As mentioned at paragraph 2.23 a copy of the public consultation comments, including from amenity groups, was not shared with the appellant during determination of the application. Our understanding of the objections raised are therefore based on the summary in the Committee Report. Having reviewed these, we consider that all meaningful planning matters raised as an objection have been adequately addressed in the previous sections of this Statement. The majority of responses objected to the loss of allotments and as explained previously it is considered that the development complies with Local Plan Policy GB8 in this respect.
- 5.62 Several objections raised that the site is an Asset of Community Value. From a planning perspective, the implications of this designation would only take effect if the appellant sold the land, which is not the intention here.

6.0 **Consistency with the development plan**

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

6.2 The Committee Report concluded that:

“The proposal is broadly compliant with the statutory development plan. However, where there are areas of non-compliance this must be balanced against the significant planning and heritage benefits arising.”

6.3 And

“It is therefore considered that, on balance, the proposed development is an appropriate response to the planning framework and is acceptable.”

6.4 This conclusion was reached following extensive consideration of the planning application proposals and led to the application being recommended for approval. The appellant agrees with this conclusion reached within the officer’s report.

6.5 As set out in the previous sections, the proposed development complies with the statutory development plan in all respects, except the loss of Local Open Space in conflict with London Plan Policy G4. The site is categorised as allotment land open space and the proposed allotment scheme is considered to present equivalent or better provision compared to existing, thus meeting the exception criteria in Local Plan Policy GB2.

6.6 The process of ‘weighing up’ of all relevant factors to determine whether a planning application can be either approved or refused is described as the ‘planning balance’. In this case, the harm arising from the conflict with London Plan Policy G4, should be weighed against the significant heritage and public benefits arising from the proposed development which are material considerations. These benefits are outlined at paragraph 4.9 of this Statement and would be secured via legal agreement or planning condition as relevant.

6.7 In this case, the material considerations in the form of planning benefits are considered to carry substantial weight in the planning balance that outweighs the harm arising from the loss of a small area of Local Open Space, such that planning permission should be granted.

6.8 Having had special regard to the requirement to preserve the character and appearance of the Conservation Area under Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990, we consider the appeal proposals to be acceptable.

7.0 Planning conditions

7.1 A schedule of planning conditions for the development was provided in the Committee Report. The appellant has reviewed these as part of the appeal process and re-provides the conditions in Table 7.1, with amendments shown in bold and strikethroughs that are considered necessary. The majority of amendments are related to phasing the conditions. The intention is that the allotments would be re-provided early on in the construction programme and as such amendments are proposed to ensure that this can be facilitated and become operational without being delayed by the need to discharge relevant conditions associated with the residential phase.

7.2 These conditions are considered necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other as required by NPPF paragraph 56.

Table 7.1 Condition wording

	Wording	Comment
1	<p>The development hereby permitted shall be begun within 3 years from the date of this permission.</p> <p>Reason: To prevent the accumulation of unimplemented planning permissions and to comply with Section 91 of the Town and Country Planning Act 1990 (as amended) and to meet the requirements of Section 51 of the Planning and Compulsory Purchase Act 2004 and to meet the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015</p>	As per Committee Report.
2	<p>The proposed development shall be carried out in all respects in accordance with the proposals contained in this application and the plans submitted:</p> <p>Drawings: Received 24/09/2021: PAR-PTE-ZZ-ZZ-DR-A -10001-P1; PAR-PTE-ZZ-ZZ-DR-A -10002-P1; PAR-PTE-ZZ-ZZ-DR-A -10005-P1; PAR-PTE-ZZ-ZZ-DR-A -10006-P1; PAR-PTE-ZZ-00-DR-A-10100-P4; PAR-PTE-ZZ-RF-DR-A-10104-P3; PAR-PTE-Z1-00-DR-A-10100-P3; PAR-PTE-Z1-01-DR-A-10101-P2; PAR-PTE-Z1-02-DR-A-10102-P2; PAR-PTE-Z1-03-DR-A-10103-P3; PAR-PTE-Z1-B1-DR-A-10099-P2; PAR-PTE-Z2-00-DR-A-10100-P4; PAR-PTE-Z2-ZZ-DR-A-10101-P1; PAR-PTE-Z2-ZZ-DR-A-10200-P2; PAR-PTE-ZZ-ZZ-DR-A-10201-P1; PAR-PTE-ZZ-ZZ-DR-A-10300-P4; PAR-PTE-ZZ-ZZ-DR-A-10305-P1; PAR-PTE-ZZ-ZZ-DR-A-10306-P2; PAR-PTE-VE-ZZ-DR-A-10307-P4; PAR-PTE-VG-ZZ-DR-A-10308-P3; PAR-PTE-ZZ-ZZ-DR-A-10315-P1; PAR-PTE-ZZ-ZZ-DR-A-10316-P1; PAR-PTE-VE-ZZ-DR-A-10317-P3; PAR-PTE-VF-ZZ-DR-A-10318-P1; PAR-PTE-ZZ-ZZ-DR-A-10319-P1; PAR-PTE-ZZ-ZZ-DR-A-10320-P1; PAR-PTE-ZZ-ZZ-DR-A-10401-P1; PAR-PTE-ZZ-ZZ-DR-A-10402-P1; PAR-PTE-ZZ-ZZ-DR-A-10403-P1; PAR-PTE-ZZ-ZZ-DR-A-10404-P2; 766-FH-XX-00-DP-L-101-P3.</p>	As per Committee Report Addendum

<p>Received: 09/09/2021: PAR-PTE-ZZ-ZZ-DR-A-10701-P1;PAR-PTE-ZZ-XX-SH-A-99600 Rev E Documents: Design and Access Statement (Produced by Pollard Thomas Edwards; dated November 2020); Design and Access Statement: Playspace Addendum (Produced by Pollard Thomas Edwards; received 21/09/2021); Additional tree information (received: 01/10/2021); Flood Risk Assessment & SuDS Strategy Report Rev 05 (Produced by Heyne Tillett Steel; Dated: September 2021); Air Quality Assessment (Ref: P9214J704b Rev v3.0; Produced by Jomas Associates Ltd; dated 27/09/2021); Energy and Sustainability Statement Rev C (Produced by Etude; dated September 2021); Feasibility Cost Estimate Rev G (Produced by CSA; dated 23/12/2020); Statement from Northumberland Estates (received 21/09/2021); Daylight, Sunlight and Overshadowing Assessment Report (Ref: 62429/01/TRL/BK; produced by Lichfields; received 14/09/2021); Acoustic Note AP02.ad.103092A (Produced by Acoustics Plus; dated 16/06/2021); Transport Note (Produced by Caneparo Associates; received 03/06/2021); Outline Construction Logistics Plan (Produced by Caneparo Associates, dated November 2020); Urban Greening Factor (Produced by Farrer Huxley; dated December 2020); Health Impact Assessment (Produced by Lichfields; dated 03/12/2020); Heritage, Townscape and Visual Impact Assessment (Produced by Lichfields; dated December 2020); Statement of Community Involvement (Produced by Lichfields; Dated December 2020); GLA Carbon Emission Reporting Spreadsheet (received 16/12/2020); A Written Scheme of Investigation for an Archaeological Evaluation (Produced by AOC Archaeology Group; dated September 2016); Arboricultural Impact Assessment and Method Statement Rev B (Produced by Greenspace Ecological Solutions; Dated November 2020); Construction Method Statement (Produced by Blue Sky Building; Dated November 2020); Geo-Environmental & Geotechnical Assessment Report (Produced by Jomas Associates; Dated 13/11/2020); Historic environment assessment (Produced by Mola; Dated November 2020); Residential Travel Plan (Produced by Caneparo Associates; Dated November 2020); Archaeological Evaluation Report (Produced by AOC Archaeology Group; dated October 2016); Ecological Impact Assessment (Produced by Ecosa Ltd; Dated December 2020); Delivery and Servicing Plan (Produced by Caneparo Associates; Dated November 2020); Planning Statement (Produced by Lichfields; dated December 2020); Transport Assessment (Produced by Caneparo Associates; Dated December 2020); Financial Viability Assessment Report (Produced by Savills; Dated August 2021).</p> <p>Reason: To ensure the development is carried out in accordance with the planning permission, a satisfactory standard of development is secured and to allow the local planning authority to review any potential changes to the scheme</p>	
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<p>3</p>	<p>Prior to the commencement of development on the residential phase, including any demolition works, a written scheme of investigation (WSI) shall be submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and:</p> <p>A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works; and</p> <p>B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.</p> <p>Reason: In order to safeguard the site in terms of its archaeological interest in accordance with Local Plan (2015) policy CC4 and London Plan (2021) policy HC1, coupled with the requirements of the National Planning Policy Framework 2021.</p>	<p>Amendment to introduce phasing.</p>
<p>4</p>	<p>No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p> <p>Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. In accordance with Local Plan (2015) policy EQ3 and London Plan (2021) policy SI5, coupled with the requirements of the National Planning Policy Framework 2021.</p>	<p>As per Committee Report.</p>
<p>5</p>	<p>Prior to the commencement of development, including any demolition works, a detailed Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall provide details of how demolition and construction works are to be undertaken and include:</p> <p>i. The identification of stages of works;</p> <p>ii. measures to mitigate noise, dust and air quality;</p> <p>iii. details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays);</p>	<p>As per Committee Report.</p>

	<p>iv. Procedures for maintaining good public relations including complaint management, public consultation and liaison;</p> <p>v. Mitigation measured as defined in BS 5228: Parts 1 and 2: 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from construction works.</p> <p>Reason: In order to safeguard the amenities of adjoining residents and the amenities of the locality in accordance with Local Plan (2015) policies CC1, CC2, GB7, EQ4 and EQ5, London Plan (2021) policies D14, G6 and S11, coupled with the requirements of the National Planning Policy Framework 2021.</p>	
6	<p>Prior to the commencement of development, including any demolition works, and notwithstanding the approved details, a revised Construction Logistics Plan shall be submitted to, and approved in writing by, the Local Planning Authority. The Plan shall accord with TfL guidance and shall include:</p> <ul style="list-style-type: none"> i. a site plan (showing the areas set out below); ii. confirmation that a pre-start record of site conditions on the adjoining public highway will be undertaken with Hounslow Highways and a commitment to repair any damage caused; iii. a Staff Travel Plan to ensure that staff and contractors travel to the site by sustainable means; iv. provision for the parking of vehicles of site operatives and visitors; v. provisions for loading, unloading and storage of plant and materials within the site; vi. details of access to the site, including means to control and manage access and egress of vehicles to and from the site for the duration of construction including phasing arrangements; vii. details of vehicle routeing from the site to the wider strategic road network; viii. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate; ix. provision of wheel washing facilities at the site exit and a commitment to sweep adjacent roads when required and at the request of the council; x. a scheme for recycling/disposing of waste resulting from demolition and construction works; xi. measures to ensure the safety of all users of the public highway especially cyclists and pedestrians in the vicinity of the site and especially at the access; xii. commitment to liaise with other contractors in the vicinity of the site to maximise the potential for consolidation and to minimise traffic impacts; 	As per Committee Report.

	<p>xiii. avoidance of peak hours for deliveries and details of a booking system to avoid vehicles waiting on the public highway;</p> <p>xiv. all necessary traffic orders and other permissions required to allow safe access to the site to be secured and implemented prior to commencement of construction;</p> <p>xv. details of the construction programme and a schedule of traffic movements;</p> <p>xvi. the use of operators that are members of TfL’s Freight Operator Recognition Scheme (FORS);</p> <p>xvii. confirmation that all vehicles associated with the works will only park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions; and</p> <p>xviii. measures to mitigate noise, dust and air quality.</p> <p>The approved Plan shall be adhered to throughout the construction period.</p> <p>Reason. To ensure highway safety is maintained and preserved and in the interests of air quality and neighbour amenity in accordance with policies EQ2, EQ4 and EC2 of the Local Plan (2015), coupled with the requirements of the National Planning Policy Framework 2021.</p>	
7	<p>Prior to the commencement of development, including any demolition works:</p> <p>A. Details of further intrusive site investigation are required in addition to the phase 1 desk study and phase 2 intrusive investigation previously submitted. These details shall be submitted to, and approved in writing by, the Local Planning Authority. The site shall be investigated by a competent person to identify the extent and nature of contamination. The report should include a tiered risk assessment of the contamination based on the proposed end use of the site. Additional investigation may be required where it is deemed necessary.</p> <p>B. If required, a scheme for decontamination of the site shall be submitted to the Local Planning Authority, for written approval. The scheme shall account for any comments made by the Local Planning Authority before the development hereby permitted is first occupied.</p> <p>During the course of the development:</p> <p>C. The Local Planning Authority shall be notified immediately if additional contamination is discovered during the course of the development. A competent person shall assess the additional contamination, and shall submit appropriate amendments to the scheme for decontamination in writing to the Local Planning Authority for approval before any work on that aspect of development continues.</p>	As per Committee Report Addendum

	<p>Before the development is first brought into use:</p> <p>D. The agreed scheme for decontamination referred to in clauses b) and c) above, including amendments, shall be fully implemented and a written validation (closure) report submitted to the Local Planning Authority for approval.</p> <p>Reason: Contamination is known or suspected on the site due to a former land use. The LPA therefore wishes to ensure that the development can be implemented and occupied with adequate regard for public and environmental safety, in accordance with policy EQ8 of the adopted Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	
8	<p>Prior to the commencement of development, including any demolition works:</p> <p>A detailed air quality assessment of the maximum HDV movements associated with the construction phase of the development is to be undertaken. Surrounding sensitive receptors along the expected routes (Park Road and Snowy Fielder Lane) are to be included within the assessment.</p> <p>Reason: In order to ensure that surrounding sensitive receptors will not be exposed to a significant increase in poor air quality, in accordance with policies EC2 and EQ4 of the Local Plan (2015) and policy SI1 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	As per Committee Report
9	<p>Prior to the commencement of development <u>on the residential phase</u>, including any demolition works, an Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The Ecological Management Plan shall incorporate:</p> <ul style="list-style-type: none"> i. details of measures to protect breeding birds, nests and eggs from mortality/damage, injury and disturbance, including avoidance by timing and/or appropriate supervision; ii. details of the ecological clerk of works supervision to be put in place to monitor the clearance of vegetation to ensure no impact on undiscovered or other unexpected faunal encounters; iii. details of the removal, long-term management or eradication of the invasive species found on the site, iv. an ecological lighting plan, including the number, location and specifications of the proposed external lighting; v. details of ecological enhancement, biodiversity net gains and an urban greening factor, including how a minimum urban greening factor of 0.41 and a 10% biodiversity net gain are to be delivered and achieved on site; vi. details of how the enhancement measures will be monitored, managed and maintained, including the long- 	Proposed introduction of phasing.

	<p>term design objectives, management responsibilities and maintenance schedules;</p> <p>vii. additional detail on location and type (including specifications) of bird/bat boxes and other ecological enhancements, maintenance and a commitment that any data collected is to be shared with the Council; including 20 bat boxes; 10 bird boxes; 4 log piles; 4 x insect blocks; hedgehog boxes to be installed within the approved development; and</p> <p>viii. species surveys within and around the site to demonstrate ecological enhancements.</p> <p>The development shall then be carried out in strict accordance with the approved details.</p> <p>Reason: In the interest of maintaining ecology and to result in a net gain in biodiversity in accordance with policies GB4 and GB7 of the Local Plan (2015) and policies G5, G6 and G7 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021 and under the Wildlife and Countryside Act 1981.</p>	
10	<p>A. Notwithstanding the approved details, development shall not be commenced unless and until a final and revised drainage strategy that includes a detailed drainage design incorporating drawings and supporting calculations and an updated Drainage Assessment Form that aligns with the approved drawings has been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority. It should be shown that drainage calculations, rainwater harvesting techniques and green infrastructure have been considered within the design. Proposed runoff rates from the site must be no more than three times the greenfield runoff rate. It should be shown that on-site flow as a result of the 1 in 100 year event with a climate change consideration are suitably managed. A detailed management plan confirming routine maintenance tasks for all drainage components and the company responsible for ownership of these maintenance tasks must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.</p> <p>B. No building hereby permitted shall be occupied until evidence (photographs and installation contracts) is submitted to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all of the proposed drainage components.</p> <p>Reason: To prevent the risk of flooding to and from the site in accordance with relevant policy requirements including but not limited to London Plan (2021) policies SI12 and SI13 and the Non-</p>	As per Committee Report Addendum

	Statutory Technical Standards for Sustainable Drainage Systems and Local Plan (2015) policy EQ3 coupled with the requirements of the National Planning Policy Framework 2021.	
11	<p>A. Prior to above ground works commencing on the allotment phase, details of the allotment community building shall be submitted to and approved in writing by the local planning authority, which shall include:</p> <ul style="list-style-type: none"> • Plans, elevations and sections at 1:50 • Detailed drawings at 1:20 • External materials <p>B. Prior to the occupation of any residential home, the allotment community building must be fully occupational.</p> <p>Reason: In order that the Council may be satisfied as to the details of the development in the interests of the visual amenity of the area and to ensure that the allotment community building is available for use when the allotments are complete and to satisfy the requirements of policies CC1, CC2, CC4 and GB8 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to introduce phasing.
12	<p>A. Prior to above ground works commencing on the residential phase, samples of all materials to be used in the construction of the external surfaces of the development hereby permitted shall be submitted to and approved in writing by the local planning authority, which shall include:</p> <ul style="list-style-type: none"> • brick (including brick, feature brick panel, brick framing feature); • Tiles/roof covering; • window treatment (including sections/reveals); • balcony details (including soffits, panels and frame); • all privacy measures, (including obscure glazing details, privacy screens etc.); • balustrading treatment (including details/ sections/ materials); • rainwater goods; • Hard landscaping; • any other materials/details to be used. <p>B. Prior to above ground works commencing on the residential phase, detailed drawings at a scale of 1:20 (or other scale to be agreed in advance by the local planning authority) shall be submitted to and approved by the local planning authority. Such details shall include:</p> <ul style="list-style-type: none"> • Elevational bay studies; • window reveals and screening; • privacy screens to balconies and obscured glazed windows; • window frames; • entrance doors and external door frames; 	Amendment to introduce phasing.

	<ul style="list-style-type: none"> • junctions between changes in materials; • brick articulation; • fenestration detailing; • roof/eaves detailing; • soffit detailing; • balcony detailing; • any other details required <p>The development shall then be carried out in accordance with the approved details and maintained as such thereafter.</p> <p>Reason: In order that the Council may be satisfied as to the details of the development in the interests of the visual amenity of the area and to satisfy the requirements of policies CC1, CC2 and CC4 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	
13	<p>Prior to above ground works commencing on the residential phase, details of extensive, biodiversity roofs (with PV panels) to be delivered in accordance with section 2.2.2 of “The GRO Green Roof Code 2014” shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The biodiversity roofs shall have extensive substrate base (undulating depths of 80-150mm); shall detail habitat features such as (but not limited to) gravels, sand, boulders or rocks; shall be planted/seeded with an agreed mix of species but this should be focused on wildflower planting, and shall contain no more than a maximum of 25% sedum.</p> <p>Reason: In the interest of maintaining ecology and to result in a net gain in biodiversity in accordance with policies GB4 and GB7 of the Local Plan (2015) and policies G5, G6 and G7 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to introduce phasing.
14	<p>A. Prior to the commencement of above ground works (excluding demolition) on the residential phase, details of mitigation measures to both private and communal outdoor amenity spaces shall be submitted to and approved in writing by the local planning authority to ensure that all occupiers should have access to amenity spaces where noise levels do not exceed 50dB LAeq,16hours. Details shall include a number:</p> <ul style="list-style-type: none"> • ledges, local screens, parapets, canopies to private amenity spaces; and • noise shelters within the communal outdoor amenity areas <p>B. Prior to the commencement of above ground works (excluding demolition) on the residential phase, details, details of a sound mitigation scheme designed to protect the future occupants (including sensitive internal spaces and external amenity areas) of the proposed development</p>	Amendment to introduce phasing.

	<p>from noise emitted from aircraft and nearby sources shall be submitted to the Local Planning Authority and approved in writing to ensure that maximum noise levels permitted within the dwellings will not exceed those that are specified in Table 4 of British Standard 8233:2014 [Living Rooms = 35 dB LAeq, 16 hours; Dining room/area = 40 dB LAeq, 16 hours; Bedroom = 35 dB LAeq, 16 hours during day-time (07:00 - 23:00) and Bedroom = 30 dB LAeq, 8 hours during night-time (23:00 - 07:00), night-time (23:00 – 07:00) LAmax noise levels within bedrooms do not exceed 45 dB LAmax more than 10 to 15 times per night.</p> <p>Such a scheme shall include details of fenestration, window and door openings, the ventilation systems, insulation, materials as well as mitigation measures for external amenity areas.</p> <p>The glazing and ventilation requirements shall also be provided regarding the control of overheating within the flats. The details so approved shall be implemented before occupation.</p> <p>C. Prior to occupation, sound insulation tests shall be submitted to and approved in writing by the Local Planning Authority. Noise tests shall be carried out taking account of worst-case environmental conditions, such as easterly operations at Heathrow, peak time traffic flows wind speed. Continuous logged data shall be submitted.</p> <p>The works shall be carried out in accordance with the approved plans before the dwellings are occupied and retained thereafter.</p> <p>Reason: To ensure a high quality of accommodation for the future residents in accordance with policies CC1, CC2 and EQ5 of the Local Plan (2015) and policy S11 of the London Plan (2021), coupled with the requirements of the National Planning Policy Framework 2021.</p>	
15	<p>A. Prior to the commencement of above ground works (excluding demolition) on the residential phase, details shall be submitted to and approved by the Local Planning Authority that demonstrate:</p> <ul style="list-style-type: none"> • At least three of the key elements of the building envelope (external walls, windows roof, upper floor slabs, internal walls, floor finishes/coverings) are to achieve a rating of A+ to D in the Building Research Establishment (BRE) The Green Guide of specification. • At least 50% of timber and timber products are to be sourced from accredited Forest Stewardship Council (FSC) or Programme for the Endorsement of Forestry Certification (PEFC) scheme. <p>B. Prior to occupation, evidence (e.g. photographs and copies of installation contracts) shall be submitted to and approved by the Local Planning Authority to demonstrate that the development has been carried out in accordance</p>	<p>Amendment to introduce phasing. Part B wording is considered to be onerous and unnecessary. A compliance requirement is considered to be sufficient, similar to the wording at Condition 14.</p>

	<p>with the approved details under Part A of this condition. The development shall be maintained in accordance with the approved details at all times thereafter. The works shall be carried out in accordance with the approved details.</p> <p>Reason: in order to ensure the sustainable sourcing of materials in accordance with policy EQ2 of the Local Plan (2015) and policies SI2 and SI7 of the London Plan (2021) and the Mayor of London’s Sustainable Design and Construction SPG coupled with the requirements of the National Planning Policy Framework 2021.</p>	
16	<p>Prior to the commencement of above ground works and notwithstanding the submitted plans, full details of both hard and soft landscape works, including for private and communal amenity spaces, new public realm elements, the green roof and the proposed allotments, and a landscape maintenance plan for the residential component of the development, for the lifetime of the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The works shall then be carried out as approved prior to the occupation of the residential development and maintained as such at all times thereafter.</p> <p>The details shall include (surface treatments to Church Walk; proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (e.g. furniture, play equipment (including the location, specifications, appearance and intended age group of those facilities); defensible spaces to residential units; rear garden landscaping; allotment details; refuse or other storage units; signs; lighting (including number, location, design and light levels etc.); proposed and existing functional services above and below ground (eg drainage power, communications cables, pipelines etc. indicating lines, manholes, supports etc.); retained historic landscape features and proposals for restoration, including boundary walls, where relevant).</p> <p>Details of the soft landscape works shall include (planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants (all to be native or an enhancement to nature); noting species; plant sizes (including root volumes) and proposed numbers/densities where appropriate; implementation programme).</p> <p>All landscaping comprised in the approved details shall be carried out during the first planting and seeding seasons following completion of construction works and prior to occupation. Any trees or shrubs planted (including any such replacements) which die within five years from the date of planting shall be replaced in the next planting season with the same species, and of comparable maturity. All play facilities shall be installed in accordance with the approved details and made available for use prior to the occupation</p>	<p>Amendment to clarify requirement to carry out landscaping prior to occupation of the residential scheme and not the allotments.</p>

	<p>of any part of the development and retained as such. The development shall be carried out strictly in accordance with the details so approved and shall be maintained in accordance with the approved management programme.</p> <p>Reason: To ensure a satisfactory appearance of the site and the adjacent the area, to provide satisfactory levels of play equipment and to enhance green infrastructure and biodiversity in accordance with policies SC5, CC1, CC2, CC4, GB4, GB7 and GB9 of the Local Plan (2015) and policies D4, D5, D8, S4, G1, G5, G6 and G7 of the London Plan (2021) and the Mayor of London’s The Shaping Neighbourhoods: Play and Informal Recreation SPG coupled with the requirements of the National Planning Policy Framework 2021.</p>	
17	<p>Prior to the commencement of above ground works on the residential phase, details of the pedestrian visibility splays to the approved accesses that demonstrate a minimum of 2.4m x 2.4m are provided on either side of the accesses are to be submitted to and approved in writing by the Local Planning Authority.</p> <p>The approved details shall be carried out in accordance with the approved detail and so maintained at all times.</p> <p>Reason. In order to minimise danger, obstruction and inconvenience to users of the highway and of the access in accordance with policy EC2 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to introduce phasing.
18	<p>Prior to the commencement of above ground works on the residential phase and notwithstanding the submitted plans, full details of four blue badge parking bays for the residential component of the development and one blue badge parking bay for the allotment component of the development shall be submitted to and approved in writing by the Local Planning Authority. The bay serving the allotments shall be further set back from the highway as part of these details.</p> <p>The bays shall be installed prior to the occupation of the development and in accordance with the approved details and so maintained at all times thereafter.</p> <p>Reason: In order to promote sustainable modes of transport, in accordance with policies CC1, CC2 and EC2 of the Local Plan (2015) and policies T6 and T6.1 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to introduce phasing.
19	<p>Prior to the commencement of above ground works on the residential phase, full details of the Electric Vehicle Charging Points, each capable of a minimum output of 7.2kW, shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the number, location and manufacturer’s specifications.</p>	Amendment to introduce phasing.

	<p>The charging points shall be installed in accordance with the approved details and so maintained at all times thereafter.</p> <p>Reason: In order to promote sustainable modes of transport, in accordance with policies CC1, CC2 and EC2 of the Local Plan (2015) and policies T6 and T6.1 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	
20	<p>Prior to occupation of the residential phase, a Delivery and Servicing Plan (DSP) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. The DSP shall cover as a minimum:</p> <ul style="list-style-type: none"> • Full details of the management of the bollard and the vehicles permitted to access the through route off Park Road; and • Full details of the refuse strategy. <p>Reason. To ensure highway safety is maintained and preserved in accordance with policy EC2 of the Local Plan (2015), coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to introduce phasing.
21	<p>Prior to occupation and notwithstanding the submitted plans, full details of the proposed vehicular and pedestrian access, to and within the site as well as extending the footway south along the eastern side of Snowy Fielder Way that extends outside of the site shall be submitted to and approved in writing by the Local Planning Authority. This includes, but is not exhaustive, a reduced distance for the pedestrian crossing on Park Road and details of the visibility splays for both Snowy Fielder Waye and Park Road accesses.</p> <p>No part of the development hereby permitted shall be occupied until the new means of the access works have been sited, laid out and constructed in accordance with the approved details.</p> <p>The approved details shall be carried out in accordance with the approved detail and so maintained at all times.</p> <p>Reason. In order to minimise danger, obstruction and inconvenience to users of the highway and of the access in accordance with policy EC2 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	As per Committee Report.
22	<p>Prior to occupation of the residential phase, the vehicular access, turning areas, and parking spaces (including spaces for people with disabilities and any electric vehicle charging points approved) and the access to them hereby approved shall be provided in accordance with the scheme shown on the Ground Floor Site Plan and Zone 1 – Basement Plan (Refs: PAR-PTE-ZZ-00-DR-A-10100 P4; PAR-PTE-Z1-B1-DR-A-10099 P2) or any subsequently approved drawings (including as part of Conditions 17, 18, 19 and 21) approved in writing by the Local Planning Authority. This provision shall be</p>	Amendment to introduce phasing.

	<p>permanently available for the occupiers and users of the premises and used for no other purpose.</p> <p>Reason: To ensure that there are adequate servicing facilities within the site in the interests of highway safety in accordance with policy EC2 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	
23	<p>Prior to occupation of the residential phase, a Parking Management Plan (PMP) shall be submitted to and approved in writing by the Local Planning Authority. The PMP shall include the following:</p> <ul style="list-style-type: none"> i. details of how parking will be allocated and leased and how this will be operated and enforced; ii. details of measures proposed to restrict parking to designated bays only and prohibit parking on the access road; iii. a commitment to convert passive EV bays to active when demand requires; iv. a commitment to remove parking spaces when residents that have a right to park move out or their circumstances change so that they no longer need a space; v. measures to ensure that all future residents are informed of the PMP. <p>The car parking areas shall thereafter be managed in compliance with the approved PMP.</p> <p>Reason: In order to promote sustainable modes of transport and safeguard the amenities of surrounding residential properties and ensure minimal disruption of traffic in the locality, in accordance with policies CC1, CC2 and EC2 of the Local Plan (2015) and policies T4 and T6 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to introduce phasing.
24	<p>Prior to occupation of the residential phase and notwithstanding the submitted details, full details (including the number, location, the design of secure structures and manufacturer's specifications) of all cycle stands for the occupants of, and visitors to, the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The approved facilities shall be fully implemented and made available for use before any part of the development is first occupied and thereafter retained for use at all times without obstruction.</p> <p>Reason: To support sustainable transport objectives; in accordance with policy EC2 of the Local Plan (2015) and policy T5 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to introduce phasing.
25	<p>Prior to occupation of the residential phase, the development shall achieve 'Secured by Design' accreditation awarded by the Design-Out Crime Officer from the Metropolitan Police Service on behalf of the Association of Chief Police Officers (ACPO).</p>	Amendment to introduce phasing.

	<p>No dwelling shall be occupied until accreditation has been achieved and evidence of such accreditation has been submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well-being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 and to ensure the development provides a safe and secure environment in accordance with policy CC2 of the Local Plan (2015) and policy D11 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021</p>	
26	<p>A. The development hereby permitted shall be implemented in accordance with the approved Energy Strategy.</p> <p>B. Prior to first occupation of any dwelling within the development hereby approved evidence (e.g. photographs, installation contracts and As-Built certificates under the Standard Assessment Procedure/National Calculation Method) should be submitted to the Local Planning Authority and approved in writing to show that the development has been constructed in accordance with the approved Energy Strategy, and any subsequent approved revisions, and achieved a 78% reduction in emissions.</p> <p>C. Upon final commencement of operation of any low and zero carbon technologies, suitable devices for the monitoring of the low and zero carbon technologies shall have been installed, and the monitored data shall be submitted automatically to a monitoring web-platform at daily intervals for a period of three years from the point of full operation.</p> <p>Reason: To ensure that the development makes the fullest contribution to minimising carbon dioxide emissions in accordance with policies CC2 and EQ1 of the Local Plan (2015) and policies S12 and S14 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021</p>	As per Committee Report.
27	<p>Prior to first occupation of the residential phase, evidence (schedule of installed fittings and manufactures literature) shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that the development has achieved an internal water use of 105L/person/day or less (plus 5 litres for outside use) in line with the Water Efficiency Calculator for new dwellings from the Department of Communities and Local Government. Measures integrated shall be retained for the lifetime of the development.</p> <p>Reason: in order to protect and conserve water supplies and resources and in the interest of sustainable development in accordance with policy EQ2 of the Local Plan (2015) and policy S15 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to introduce phasing.

<p>28</p>	<p>During the course of the development, the Local Planning Authority shall be notified immediately if higher volumes of groundwater are encountered during basement excavations. A competent person shall assess the higher volumes of groundwater, shall consult with Natural England and submit appropriate amendments to the dewatering methodology in writing to the Local Planning Authority for approval in writing before any work on that aspect of development continues.</p> <p>Reason: In order to protect features of special interest for which Syon Park SSSI is notified and in the interest of maintaining ecology in accordance with policies GB4 and GB7 of the Local Plan (2015) and policies G5, G6 and G7 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021 and under the Wildlife and Countryside Act 1981.</p>	<p>As per Committee Report.</p>
	<p>No demolition or construction work shall take place on the site except between the hours of 8:00am to 6:00pm on Mondays to Friday and 8:00am to 1:00pm on Saturdays and none shall take place on Sundays and Public Holidays without the prior agreement of the Local Planning Authority. Daytime works will not exceed 75 dB LAeq,T at the worst-affected residential property during the above time periods.</p> <p>Reason: To ensure that the proposed development does not prejudice the amenities of the locality in accordance with policies CC1, CC2 and EQ5 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	<p>Not considered necessary as hours of operation are secured by CEMP condition.</p>
<p>29</p>	<p>The design and installation of any fixed plant serving the development shall not exceed cumulative rating levels (LAR'Tr) of at least 10dB below the background noise level LA90,T when measured or predicted at 1m from the facade of the nearest noise sensitive premises. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound.'</p> <p>Prior to occupation of the residential phase and upon installation of the proposed fixed plant and any associated mitigation, an acoustic commissioning survey will be undertaken. The cumulative measured or calculated Rating Level of noise emitted from all mechanical services plant including heating, ventilation and air conditioning (HVAC) shall be 10dB(A) below the existing background noise level, at all times that the mechanical system etc operates. The measured or calculated noise levels shall be determined at the boundary of the nearest ground floor noise sensitive premises or 1 meter from the façade of the nearest first floor (or higher) noise sensitive premises, and in accordance to the latest revision of British Standard 4142.</p> <p>Reason: To ensure that the future occupants of the development do not suffer an unreasonable level of noise and disturbance in accordance with policy EQ5 of the Local Plan (2015) and policy D14</p>	<p>Amendment to introduce phasing.</p>

	of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.	
30	<p>All Non-road Mobile Machinery (NRMM) used during the course of the development that is within the scope of the GLA 'Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (SPG) dated July 2014, or any successor document, shall comply with the emissions requirements therein.</p> <p>Reason: In the interests of air quality in accordance with policy EQ4 of the Local Plan (2015) and policy S11 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021</p>	As per Committee Report.
31	<p>In this condition 'retained tree' means any existing tree which is to be retained in accordance with the approved plans and particulars, and paragraphs (a) and (b) below shall have effect until the expiration of five years from the date of the occupation of any of the buildings hereby approved.</p> <p>a) No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the prior written approval of the Local Planning Authority. Any topping or lopping approved shall be carried out in accordance with British Standard 3998 (Tree Work) or any other BS replacing this.</p> <p>b) If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.</p> <p>c) The erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved plans and arboricultural report and particulars before any equipment, machinery or materials are brought onto the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site.</p> <p>Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the prior written approval of the Local Planning Authority.</p> <p>Reason: To enable the Local Planning Authority to ensure the protection of retained trees from damage, in the interests of visual amenity, in accordance with policies CC1, CC2 and GB7 of the Local Plan (2015) and policy G7 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	As per Committee Report.
32	All removal of trees, hedgerows, shrubs, scrub or tall herbaceous vegetation shall be undertaken between September and February inclusive. If this is not possible then a suitably qualified ecologist shall check the areas concerned immediately prior to the clearance	As per Committee Report.

	<p>works to ensure that no nesting or nest-building birds are present. If any nesting birds are present then the vegetation shall not be removed until the fledglings have left the nest.</p> <p>Reason: All wild birds, their nests and young are protected during the nesting period under The Wildlife and Countryside Act 1981 (as amended). In the interests of nature conservation and biodiversity, in accordance with policy GB7 of the Local Plan (2015) and policy G6 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	
33	<p>All removal of woodland or scrub shall be carried out in the reptile active season and under an Ecological Watching Brief prepared by a suitably qualified ecologist.</p> <p>Reason: To ensure reptiles are protected during their hibernation period in the interests of nature conservation and biodiversity in accordance with policy GB7 of the Local Plan (2015) and policy G6 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	As per Committee Report.
34	<p>Notwithstanding the provisions of the Town and Country Planning (General Permitted Development Order) 19952015(or any order revoking or re-enacting that order) no enlargement of the premises or any additional structures/buildings within the curtilage of the site shall be carried out.</p> <p>Reason: In order not to prejudice the amenities of the adjoining properties and in order that the Local Planning Authority is able to exercise control over future development of the site in accordance with policies CC2 and CC4 of the Local Plan (2015) and policy D6 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.</p>	Amendment to reference latest legislation.
35	<p>The roof areas of the development hereby permitted shall not be used as a balcony, roof garden or similar amenity area and, furthermore, no balustrades, railings or other means of enclosure or means of permanent access shall be erected on these areas.</p> <p>Reason: To control overlooking and noise disturbance and safeguard the privacy and amenities of neighbours in accordance with policy CC2 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	As per Committee Report.
36	<p>No water tanks, plant, lift rooms or other structures shall be erected upon the roof of the approved building other than what is shown on the approved drawings.</p> <p>Reason: To control the appearance of the building and safeguard the appearance of the area and to protect the amenities of neighbours, in accordance with policies CC1, CC2 and CC4 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	As per Committee Report.

37	<p>Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking, amending or re-enacting that Order) no satellite dishes, telecommunications masts, antennas or equipment or associated structures, shall be installed on the building hereby approved without written approval from the Local Planning Authority.</p> <p>Reason: To protect the appearance of the building, and accord with policies CC1, CC2 and CC4 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	As per Committee Report.
38	<p>No pipes, flues, lighting equipment, or awnings, other than those shown on the approved plans shall be fixed on any elevation of any building without the prior written approval of the local planning authority.</p> <p>Reason: To protect the appearance of the building, and accord with policies CC1, CC2 and CC4 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.</p>	As per Committee Report.

Appendix 1 Inspector's Report



Appeal Decisions

Inquiry Held on 9-12 & 16-19 October 2018

Site visits made on 8, 12 & 18 October 2018

by Nick Fagan BSc (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State for Housing, Communities and Local Government

Decision date: 29th November 2018

Appeal Ref A: APP/F5540/W/17/3192092

Park Road Allotments, Park Road, Isleworth, Middlesex TW8 8JF

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Northumberland Estates against the decision of the Council of the London Borough of Hounslow.
 - The application Ref P/2016/0717 & 00707/E/P110, dated 15 February 2016, was refused by notice dated 6 July 2017.
 - The development proposed is the erection of eight blocks of three- and four-storey buildings to create 119 flats and 8 houses (127 residential units in total) with car parking at basement and street level and associated works.
-

Appeal Ref B: APP/F5540/W/17/3192086

Land at Syon Park, Brentford, Middlesex TW8 8JF

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Northumberland Estates against the decision of the Council of the London Borough of Hounslow.
 - The application Ref P/2016/0716 & 00707/E/P111, dated 15 February 2016, was refused by notice dated 6 July 2017.
 - The development proposed is the formation of a new allotment area with associated infrastructure.
-

Decisions

1. Both appeals are dismissed.

Main Issues

Appeal A:

1. The extent to which the loss of Local Open Space caused by the proposal conflicts with adopted local policy and the level of harm thereby arising.
2. Whether the proposed development would harm the character and appearance of the area, including whether it would preserve or enhance the Isleworth Riverside Conservation Area.

Appeal B:

1. Whether the proposed development would adversely affect the significance of the Grade I listed Capability Brown designed Registered Park and Garden.
2. Whether it would preserve the settings of the Robert Adam designed Grade I listed Syon House and the Grade 1 listed Lion Gate and lodges onto London Road.

3. Whether it would preserve or enhance the Isleworth Riverside Conservation Area.
4. Whether the proposed allotments would encourage continued use of allotments and satisfactorily replace the Park Road allotments (which would be lost in the Appeal A scheme).
5. Whether the proposed development would be inappropriate on this Metropolitan Open Land (MOL), whether it would harm the MOL's openness, and whether it is necessary to establish 'very special circumstances' in terms of Green Belt/MOL policy.

Procedural Matters

2. Two signed S106 Unilateral Undertakings (UUs) dated 19 October 2018 were submitted on the last day of the Inquiry. I address these in more detail below.
3. The Council accepts, as set out in the Transport Statement of Common Ground, that its third refusal reason in respect of the appeal A scheme has been overcome by the appellant's submission of revised plans, which delete visitor parking spaces from the scheme and increase the amount of cycle parking.
4. In view of the joint proposals' aim to replace the allotments on Park Road with new allotments inside nearby Syon Park it seems logical and sensible to consider Appeal B first.

Description of the Area and Relationship of the Two Sites

5. Syon Park contains Syon House, the historic London seat of the Dukes of Northumberland dating back to Tudor times and which continues today. The House, originally built by Lord Protector Somerset in the mid-sixteenth century, was extensively remodelled both internally and externally by Robert Adam in the mid-eighteenth century at the time that Capability Brown re-landscaped the Park, including by the addition of Adam's Lion Gate entrance and lodges on London Road and a new carriage drive sweeping round towards the House over Adam's bridge spanning Brown's new serpentine lake.
6. Syon House and the Lion Gate and lodges are both Grade I listed buildings (LBs). The 80 hectare Park contains many other LBs, listed Grade II apart from the Conservatory to the north of the House and the Gate Lodges to the House which are also Grade I. Syon Park is listed Grade I on the list of Registered Parks and Gardens and is designated MOL. It lies on the north bank of the Thames opposite Kew Gardens, a World Heritage Site and it is situated within the buffer zone of the WHS.
7. The Park is situated behind a tall brick wall (also Grade II listed) immediately to the east of the historic Thameside village of Isleworth. The historic core of the old village, the riverside including Isleworth Ait (the island situated at this bend in the river, now a nature reserve), the famous London Apprentice pub and All Saints' Church as well as Syon Park all lie within the Isleworth Riverside Conservation Area (CA). Despite the suburban, predominantly twentieth century, development of London that has grown around it the area still retains its village feel and within the Park its arcadian landscape that links with Brown's works at Kew, Richmond and Hampton Court.
8. Park Road links the historic riverside of old Isleworth to the busy main A310 Twickenham Road and A315 London Road at Busch Corner. On its eastern side is the historic boundary wall of Syon Park with a wide belt of mature trees

behind it. Appeal site A is a 1.17 hectare area of historic allotment gardens on the west side of the road, which were provided for the local populace by the Northumberland Estate during World War I and have been used continuously as such ever since.

9. To the south of Appeal site A is the overgrown cemetery of All Saints' Church and accessed down a historic avenue of lime trees the Church itself. To the west is the post-World War II suburban housing development in first Snowy Fielder Way (SFW) and then Hepple Close, two cul-de-sacs beyond which are the higher bulkier buildings of West Middlesex Hospital. These cul-de-sacs are also within the CA. North of this is Isleworth Cemetery, which the Council intends to incorporate into the CA in the near future, and beyond this the modern predominantly three-storey residential development at Union Lane .
10. Appeal B is a site of 1.31 hectares within the currently grazed part of the historic Park just to the west of the Duchess Walkway, the public path which links the Duchess Gate on London Road to Syon House and the commercial facilities next to it, including the Hilton Hotel opened in 2011. The combined proposals are to redevelop the Park Road Allotment site with houses and flats and to relocate the allotments to this site in Syon Park, which is about ¾km away. Access to the new site would be via the Park's existing vehicular access off Park Road immediately to the south of Appeal site A.

Reasons – Appeal B

Effect on Designated Heritage Assets

11. Syon Park is one of the most important examples of Capability Brown's work because of its contribution to the arcadian Thames landscape and because his design legacy on the parkland is still recognisably intact, particularly in the area between Syon House and London Road, which is where the appeal site is situated. Only 35 of Brown's landscapes out of 170 are Registered at Grade I and this is only one of four of his landscapes in Greater London, the others being Kew Gardens, Hampton Court and St James' Park.
12. Brown's work in this part of the Park consisted principally of the creation of the curving serpentine lake, the planting of belts of trees to the boundaries and clumps or individual trees in a parkland setting and the creation of the carriage drive from Robert Adam's Lion Gate to link with his bridge over the lake before linking with the then existing Great Lime Avenue. Syon Park is typical of Brown's work in that he has created by these interventions the illusion of a never-ending arcadian landscape in what is a modestly sized area of only 26 hectares in this western side of the Park. The appellant acknowledges that the proposal would reduce the extent of the parkland laid out by Capability Brown. Historic England acknowledges that harm will be caused to the Registered Park.¹
13. However it is atypical of much of Brown's work which is generally exclusive enclosed landscapes designed to show off the owners' wealth and prestige, because the Lion Gate allows fairly extensive views into the Park from the public highway. This was clearly deliberate: Brown and Adam were working for the Duke at the same time. The Lion Gate and lodges, the lake and Adam's bridge over it and the carriage drive linking them and then opening up vistas of

¹ Tab 12 of TIS Evidence

the House down the Great Lime Avenue were planned together. As such the view into the parkland grazed by livestock, from the London Road, is as important to the park's significance as the view from the House itself, especially as the Lion Gate was conceived as the new grand entrance to the remodelled House. This view is very similar now to the view after the Brown and Adam works to the Park in the 1770s. For these reasons the setting of the Lion Gate, which extends not only into the Park but also to the suburban development on the north side of London Road, is a very important element of its significance.

14. Syon House can only be seen from the bridge over the lake where the carriage drive turns sharply eastwards down the Grand Lime Avenue. Views of the appeal site are severely constrained from the House by distance and the mature trees that effectively screen any views of it. However, setting is not confined to inter-visible views and the grand setting of the House includes, in the context of Brown's and Adam's works, the important carriage drive from the Lion Gate which was intended to gradually reveal to those travelling towards it the magnificence of the remodelled House and the status of the Percy family. As such the proposal would adversely impact on its setting. However, this impact would be relatively modest given the House's extensive setting and in my judgement insufficient to harm its overall significance as a LB, which in large part relies on its Adam interiors and its historic fabric.
15. However, the proposed allotments would be clearly visible from the Lion Gate, which is open and wide and allows expansive vistas across the parkland from London Road. By their nature the proposed allotments would retain the agricultural use of the site and would consist of predominantly open cultivated ground. But they would be divided from the rest of the grazed parkland by a stock proof fence and hedge, which are the antithesis of Brown's open landscape.
16. The garden sheds, tool stores, toilet/community shelter and steel dip tanks would be modest low and temporary structures in themselves. The taller sheds would be sited next to existing mature trees. But these structures and boundary features would, along with the appearance of the land divided up into 37 separate allotments, represent an alien intrusion into the Brownian parkland in a highly visible location. The reinstatement of historic tree planting belts either side of the lodges would not compensate for such a significant intrusion into Brown's historic parkland. The restoration of the carriage drive would clearly be a benefit but neither would this compensate for the above harm. In any case I am surprised that such "*a minor piece of work having a major effect*"² is not in the Estate's Management Plan for Syon Park³.
17. The allotments would also be visible from the Duchess Walk and the land adjoining it and from the road into the main car park and the Hilton Hotel as demonstrated by the verified photomontages in Viewpoints (VP) 2 and 4⁴. These are also prominent views to which the public have access.
18. There would be glimpsed views of the allotments from the bridge over the lake at VP3, and of course from the northern section of the carriage drive, which is to be restored under the proposals. The bridge, an early example of the use of

² NB EIC

³ CD-F7

⁴ Of CD-C7

wrought iron in such a structure, is a replacement of Adam's original bridge and is itself listed Grade II. There would be a marginal impact on its setting by the proposed glimpsed allotments but this would not in my opinion compromise its significance. The fact that the drive would not be open to the public and that the Estate has no intention of reopening the Lion Gate entrance does not however lessen the effect of the incursion of the alien form and appearance of the allotments into the open and grazed parkland, which forms the important southern setting of the Lion Gate and lodges.

19. Historic England advice states that "*the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change*"⁵. The allotments would be a small-scale change in that they only form a small proportion of the area of the Park and would retain the openness of the land, especially when compared to the nearby Hilton Hotel. But they would in my view constitute, with the hotel, cumulative incremental change alien to the original design of the park by Brown. It is also noteworthy that the hotel was outside the area of the Park that was remodelled by Brown and in any case was justified as enabling development because it swept away a series of post-War buildings that themselves were damaging to the original Brownian design. This proposal lacks those merits.
20. Syon Park forms by far the largest and therefore most important of four character areas of the CA. Whilst the proposal would only affect a small proportion of it this effect would be contrary to the design principles adopted so successfully for this part of the Park by Brown and Adam together and it would therefore clearly fail to preserve the character and appearance of the CA.
21. For these reasons I conclude that the proposed allotments would result in less than substantial harm in terms of paragraph 196 of the National Planning Policy Framework (NPPF) to the Grade I Registered Park and Garden, the setting and thus significance of the Grade I listed Lion Gate and the character and appearance of the CA. Legal precedent determines that I must give considerable importance and weight to such harm. It is also important to note that the combined harm to these assets together is more than just the sum of the harm to each of them individually. This is because their significance is to a large extent dependent on their historical and aesthetic context as a fine example of Brown, the master landscaper and Adam, the master architect, working together to create this special and precious ensemble which has the highest level of heritage protection.
22. Policy CC4 (Heritage) of the Hounslow Local Plan (HLP) expects development proposals to conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance. Policy 7.8 (Heritage Assets and Archaeology) of the London Plan (LP) states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. For the above reasons the proposed allotments in this location would fail to accord with these Policies.

⁵ CD-F11 #28

The Heritage Balance

23. This cumulative harm should be weighed against the public benefits of the proposals. The principal benefit of relocating the allotments here is to allow the Appeal A site to be redeveloped for private rental sector housing and thus provide a considerable continuing income stream to allow for the repair and refurbishment works to the exterior and interior of Syon House and to the Lion Gate.
24. These works require the expenditure of approximately £13 million and the Council does not contest that they are important and necessary. But it maintains that they could and should be funded in another way, without harm to the Park or other heritage assets. The appellant claims that the Council has not identified any other source of funding and that the proposals are the only way in which the necessary repair works to the House can be realistically funded.
25. However, I have only been presented with limited financial information relating to this project and the Syon Estate's accounts⁶ and have no understanding of the appellant's or the Duke's wider financial interests. The appellant is a major landowner (not just in this area) and it is not for the Council to demonstrate that funds could be generated from alternative areas of its business interests sufficient to finance the necessary repairs, even if it had the wherewithal to do so. On the contrary, the onus is on appellant to demonstrate that there is no way to fund the necessary repairs other than by implementing the proposals because of the harm to the Registered Park and the Lion Gate's setting, and I am not satisfied that it has done so. So whilst I agree that this harm must be balanced against the public benefits of the repair and restoration of the two Grade I LBs in the round, I am not convinced that alternative sources of funding do not or could not exist.
26. In other words, I am unconvinced that it is necessary to harm the Park and the setting of the Lion Gate in order to achieve the benefit of repairing and restoring Syon House. The appellant agrees that the repair and restoration works to the Lion Gate are already secured via the S106 agreement attached to the Hilton Hotel and the only benefit of the proposals would be to secure such works earlier. Whilst this would be beneficial I consider such a benefit to be relatively minor and do not therefore attach great weight to it.
27. The appellant also points to the opening up of this part of the Park to public access, where there is currently no such access. I attach little weight to this argument; first because the Estate could do this anyway, for instance by simply opening up the Lion Gate and the path of the old carriage drive; and second because it does not accept that access by allotment holders and their friends and families actually constitutes 'public access'.
28. I understand that a number of different locations within the Park were considered as possible sites for the allotments. I have seen no detailed analysis of those sites and the reasons why this particular site was preferred over the others. It may be that there are other sites within Syon Park where the impact on the Park and any other heritage assets would, on balance, be deemed to be acceptable. But for the above reasons the proposal's impact in this location would be unacceptable.

⁶ CD-B19

Whether the Proposed Allotments would Encourage Continued Use of Allotments

29. The Rule 6 Party (The Isleworth Society or TIS) do not consider that there would be equivalent provision of allotments on the proposed site. HLP Policy GB8 (Allotments, Agriculture and Local Food Growing) (criterion f) states that the Council will retain allotments unless it can be demonstrated that they are no longer required or viable for such purposes. Criterion (a) of GB8 states that the Council will encourage the continued use of allotments by retaining existing allotments and resisting their loss in accordance with the borough's Allotment Strategy (AS). Two of the key aims of this Strategy are to repair and invest in the infrastructure of allotments and projects which benefit existing and potential users; and to support existing allotment societies and foster the creation of self or partial management groups⁷.
30. As far as I can make out from Policy GB8 and the AS, there is a presumption that existing allotments will be retained unless their relocation would deliver benefits to existing allotment holders because, for example, the existing allotments are unviable in some way or the new allotments would provide better facilities. That does not appear to be the case here, as I heard at the Inquiry from many of the existing Park Road allotment holders.
31. In particular, in relation to the proposed facilities at appeal site B the existing allotment holders have set out a number of drawbacks. Whereas existing plot holders are allowed to install their own garden sheds and other structures such as polytunnels, sheds on the proposed allotments are to be shared between two allotment plots and other structures are likely to be restricted due to the site's location within Syon Park. These sheds would also be fairly small and grouped around the retained clumps of trees on the site such that some of the plots would be a considerable distance away from them. There would be one galvanised dip tank per 6-8 plots but no water taps comparable to those on the existing site. I also note that a sizeable minority of plots would be sited at least partially under the canopies or in the root protection areas of the existing retained trees, which would affect their suitability as allotments.
32. I agree with allotment holders that these drawbacks would, along with the virgin nature of the soil in this location compared to the long-tilled soil on the existing allotments, mean that the replacement allotments were not as good as the existing ones in Park Road. There would be advantages in the form of a dedicated turning and unloading area at the front of the site for vehicles and a toilet would also be provided, both of which are lacking at the existing site.
33. But on balance I consider the drawbacks of the new site to outweigh the advantages. I especially consider that expecting two plots to share a small garden shed, which may be located some distance away from their respective plots, to be practically unrealistic. I consider that the restriction on structures such as polytunnels and greenhouses would discourage the long-term take-up of the allotments. I note that the 30 December 2016 judgement of the First Tribunal which upheld the designation of the current allotment site as an Asset of Community Value (ACV) also concluded that this alternative allotment site was inferior to the existing one.⁸

⁷ CD-F4 #1.0

⁸ Appendix 1 of the Rule 6 Party Statement of Case, in particular #32

34. The appellant maintains that the new allotments would be reversible. Be that as it may it cannot be the appellant's intention to reverse them, because if it was then they could not be considered to be a permanent replacement of the allotments lost by the redevelopment of appeal site A. Consequently I attach no weight to this point.
35. For these reasons I conclude that the replacement allotments on this site would be likely to discourage the continued use of allotments in the local area contrary to HLP Policy GB8 and the Council's Allotment Strategy.

Effect on MOL

36. Policy 7.17 (Metropolitan Open Land) states that MOL is given the same level of protection as the Green Belt (GB) and that inappropriate development will be refused, except in very special circumstances. HLP Policy GB1 (Green Belt and Metropolitan Open Land) says the same and that the openness of GB and MOL will be maintained.
37. NPPF paragraph 143 states that inappropriate development is, by definition, harmful to the GB (and in this case MOL) and should not be approved except in very special circumstances. NPPF paragraph 145 states that the construction of buildings should be regarded as inappropriate in the GB (and MOL) subject to a number of exceptions including:
- a) buildings for agriculture and forestry; and
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the GB (and MOL) and do not conflict with the purposes of including land within it.
38. It is agreed by the parties that the proposed allotments would not change the agricultural use of the land and so the proposed sheds, tool stores etc, even assuming that such structures are properly defined as 'buildings', benefit from the exception in NPPF paragraph 145 a) above. However, even if the Council's interpretation – that the exception given to allotments does not fall within exception a) because it is covered by b) – is correct, the proposed allotments would in my opinion preserve the openness of the MOL because the incidental storage structures are small and low and would comprise only a very small proportion of the proposed open allotment site. The proposed allotments would not conflict with the five GB/MOL purposes set out in NPPF paragraph 134 precisely because they would retain open agricultural land, albeit with an altered appearance.
39. For these reasons the proposed development would not be inappropriate development and would not compromise the openness of Syon Park as MOL. There is therefore no need to establish whether 'very special circumstances' as defined by NPPF paragraph 144 exist. The proposed allotments would comply with LP Policy 7.17, HLP Policy GB1 and the relevant above paragraphs of the NPPF.

Appeal B Conclusion

40. The proposed allotments would not be inappropriate development within or harm the openness of Syon Park as MOL and would therefore accord with local

and national policy. However, they would cause less than substantial harm to the Grade I Registered Park and Garden and the Grade I Lion Gate and lodges and would fail to preserve the character and appearance of the CA and this harm would not be outweighed by the public benefits, contrary to local and national policy. Additionally, the new allotments would not be comparably as good as those existing and this would be likely to discourage the continued use of allotments in the local area contrary to HLP Policy GB8 and the Council's Allotment Strategy. As such the proposal clearly does not comply with the development plan as a whole. For these reasons the proposal is unacceptable.

Reasons – Appeal A

Loss of Local Open Space

41. The Park Road Allotment site is designated as Local open Space (LOS). HLP Policy GB2 (Open Space) states that LOS will be protected and enhanced. In particular criterion (g) of GB2 states that LOS will be protected from development unless it has been assessed as clearly surplus to requirements or it would be replaced by equivalent or better provision in a suitable location. It is not surplus to requirements because, as is clear from the evidence of TIS and the numerous objections from existing allotment holders on the site, there is still a substantial demand for plots on this site.
42. I acknowledge that there may be more vacant plots now than before the Estate took back in-house the management of the allotments. But it is clear to me that such a situation is likely to have come about because of the short duration of the new licenses granted to the incumbent plot holders and simply because of the uncertainty surrounding the site's future arising from this development proposal as acknowledged by the appellant⁹. Both these factors would have made prospective plot holders think twice, especially if, as I heard at the Inquiry, there is no certainty that they can count on harvesting the efforts of their labours.
43. As set out above, the proposed new allotments would not in my view comprise equivalent or better provision, principally because plot holders would be obliged to share small sheds and would find difficulty in obtaining permission to install structures like greenhouses or polytunnels. It is a reasonable expectation for allotment holders to be able to have their own shed; sharing one with someone else is impractical because there would be security implications for individual plot holders' possessions. Restricting polytunnels etc is likely to discourage the long term viability and success of the allotments because it would be likely to dampen the demand for plots.
44. The appellant argues that the proposal would not lead to a deficiency in publicly accessible open space. But that argument is irrelevant in terms of Policy GB2 for two reasons. Firstly, because it requires existing LOS to be protected from development "*especially where it would lead to a deficiency in publicly accessible open space*" (my underlining); that does not mean exclusively. Second, the ACV judgement concluded that it is not just allotment holders who can access the current allotments but all their families and friends and that the allotments further the social well-being of the wider community.¹⁰

⁹ PR #4.17

¹⁰Ibid, in particular #26, 27, 37 & 38

I agree with her that this is the case. For all these reasons the loss of this LOS is contrary to HLP Policy GB2.

45. LP Policy 7.18 also states that the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area, and that replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.
46. In this case the proposals jointly result in the loss of the Park Road LOS. Even if the Appeal B site was considered acceptable (which it isn't) this would still have resulted in the overall loss of over a hectare of LOS as well as the loss of open grazing agricultural land and its replacement with the allotments, a different type of open space. For these reasons the proposed residential development of the Park Road site and the Appeal B replacement allotment scheme both fail to accord with LP Policy 7.18.
47. The appellant argues that there is a surplus of open space in the Isleworth area but it does not challenge the Council's/TIS's evidence¹¹ that there is an excess of demand over supply in respect of allotments in Isleworth. This argument may have carried some weight if appeal site B was suitable for allotments but since that is not the case the proposed residential development simply results in a loss of LOS allotment land, which the policy precludes.
48. The appellant's undisputed assertion that it could simply close the allotments overnight would not remove their LOS designation. I cannot understand why the Estate would choose to do so if this appeal fails since that would be in nobody's interest and would hardly add to the record of good custodianship of its land in the area. I note in this regard the ACV judgement's conclusion that *"there is no reason to expect that the demand for allotments will decrease and on the basis of the expressed support it is likely to increase"*¹². Bearing in mind the objections to the proposal and the continuing campaign to save the present allotments, I agree that the judge's conclusion on this point is still valid now.
49. The appellant criticises the Council for not disclosing that the site was allocated for residential development in the emerging Local Plan. The Council explains in its Note for the Inquiry¹³ the events leading up to the publication of the Local Plan Review (LPR) Consultation Document of October 2017¹⁴. Specifically, it points out (in paragraph 4 of this Note) that it was simply a human drafting error that resulted in the site wrongly being included in Appendix A of Part 2 of that Document. I agree that this is what appears to have happened, as evidenced by the copy of the tracked changes attached to ID11 containing Marilyn Smith the Interim Chief Planning Officer's instruction of 9 October 2017 to remove the site from the list. That is not surprising given the Council's Planning Committee's refusal of the two applications. The appellant does not question this explanation, I note, though it does point out that it was the Council's intention to allocate it, which is true.
50. This is a slightly embarrassing episode for the Council because the copy of the Consultation documents that went to the Council's Cabinet on 19 September 2017 (over two months after the applications had been refused by the Planning

¹¹ ID14

¹² Ibid, #41-43

¹³ ID11

¹⁴ CD-E12

Committee) still contained the site as a housing allocation. However, the Council state that the LPR consultation that took place between 23 October and 10 December 2017 made no mention of the site as a housing allocation¹⁵ and the appellant does not appear to dispute that. The Council and its officers are not immune from human error. In any case, this consultation was only a Regulation 18 Options consultation and so, even if the site had been included as an allocation site, I would attach little weight to it. The fact that it isn't included means that I afford this argument even less weight than that.

51. I consequently conclude that the proposed development would result in the unacceptable loss of LOS, specifically allotments for which there remains a proven demand in the area, contrary to HLP Policy GB2 and LP Policy 7.18. The requirements of these development plan policies are also the requirements of national policy as set out in NPPF paragraph 97, with which the proposal would also fail to comply with.

Effect on the Character and Appearance of the Conservation Area

52. I am required by statute to pay special attention to the desirability of preserving or enhancing the character or appearance of the CA¹⁶. There is no doubt that the predominantly 3½ storey development of flats will significantly change the character of the site and the area adjoining it. But change does not necessarily equate to harm even in an area of historic open space.
53. Charlotte House Care Home (CH) opposite the site in SFW and the houses in SFW to the south are two-storey, as are those on Park Road to the south of the site. However the 1960s apartment blocks in Hepple Close, which is also in the CA, are three storeys, albeit with flat roofs. Many of the buildings on the riverside are also at least three storeys or more high. Furthermore Park Road and the site itself is dominated by the backdrop of the higher and much bulkier buildings at West Middlesex Hospital to the west of Hepple Close, which have a marked impact on the setting of the CA.
54. The layout of the blocks with the end gables of the northerly blocks facing park Road would, I consider, substantially help to reduce their impact on the Park Road street frontage. They would also be seen from the south with the backdrop of the hospital buildings behind them and their impact would consequently be in keeping with the character of the area, especially because the existing tree screen on Park Road would be retained and additional tree planting introduced in front of and between the blocks.
55. The flat Blocks B1 and C1 facing CH would be considerably taller than the Care Home but there is a sufficient gap between them and CH to prevent any overbearing impact. The scheme is well designed, taking its design cues from local buildings, has a good delineation between private and shared open space, would be well landscaped and would be built of high quality materials appropriate for the area. The link from the main access road between Blocks Band C into the existing lime tree avenue of the Church would be an elegant design solution that would help to knit the scheme into its urban context. The Council did not challenge the quality of the scheme's design.
56. To my mind the only significant impact of the scheme on the character and appearance of the CA would be that the gable of Block A, which faces onto the

¹⁵ ID11 #4

¹⁶ S72(1) Planning (Listed Buildings and Conservation Areas) Act 1990

corner of SFW and Park Road, would block the glimpsed view of All Saints' Church tower from this location¹⁷. The Church tower can also be seen from some points on SFW and Blocks B1 and C1 would block those existing views.

57. The Church, which was predominantly rebuilt in 1970 following arson by a local schoolboy in 1943, has a significant presence in the CA, especially on the riverside itself. The Grade II* listed Church and The London Apprentice pub and the other residential LBs along this stretch of the river contribute significantly to the retained character and appearance of Old Isleworth. Much has been made by the Council and TIS of the Church tower's role in signalling or waymarking the heart of Old Isleworth including by its approach from the north down Park Road. I agree that this church tower (which is late fifteenth century and the oldest part of the Church), like all church towers, does indeed fulfil that role and that the blocking of views of it from the north would harm the Church's setting as a LB.
58. However, in my view it is the rebuilt Church's, including its unashamedly modernist twentieth century rebuilt addition to the tower, contribution to the Old Isleworth riverside that is most important, both as a LB and in terms of its importance to the character and appearance of the CA. In other words it is the views of the Church including its tower from the riverside that define its significance and a key element of the CA. Its significance and that of the CA as a whole would not therefore be unduly damaged by the proposed flats blocking views of the Church tower from the north.
59. The Council argues that the site forms a key open space that separates Old Isleworth from the twentieth century suburban development to the north. I disagree because there is twentieth century suburban development in SFW and Hepple Close and views from and over the site from the south are dominated by the hospital buildings. In my judgement it is Isleworth Cemetery that performs such a function and I can therefore appreciate why the Council is planning to incorporate it into the CA.
60. For these reasons I conclude that the proposed residential development would not significantly harm the character or appearance of the area and would preserve the character and appearance of the CA. It would comply with HLP Policies CC1 (Context and Character), CC2 (Urban Design and Architecture) and CC4 (Heritage), and with LP Policies 7.4 (Local Character) and 7.6 (Architecture), which together require development to be well designed and complement the character and appearance of the area.

Appeal A Conclusion

61. The proposed development would preserve the character and appearance of the CA. It would also deliver 127 new dwellings of a range of sizes appropriate to the need in the area including 46 discounted market rented units, a £30M construction project that will deliver a proportion of jobs for local people and economic benefits for the area and generate the £13M of funds from rental income that will deliver the repairs and restoration of Syon House. These would be significant benefits of the scheme, albeit that the additional dwellings are not needed to deliver a 5 year supply of deliverable sites in the Borough given that the Council can currently demonstrate over a 10 year supply.

¹⁷ Verified VP B in the D&AS – CD-B5 or VP2 on page 46 of CD-A5a

62. The appellants argue that there would be biodiversity benefits of the scheme and I do not disagree. But the current allotments provide a range of existing biodiversity benefits that would be (at least) partially lost through the scheme. On balance I consider that the overall effect on biodiversity would be neutral – and so this would not be a benefit.
63. Principally though, the proposal would result in the loss of LOS without its replacement by equivalent or better allotments contrary to the above Policies in the development plan. Whilst the HLP has no ceiling on the numbers of houses to be delivered and the development would generate an income to fund repairs to the principal Grade I LB this does not obviate the requirement in HLP Policy GB2 and LP Policy 7.18 to avoid the loss of LOS.
64. Just because there are a possibly greater number of policies within the development plan that the proposal would comply with than policies it does not mean that the development is acceptable. The appellant accepts that such a numerical approach is wrong and the absence of a range of possible types of harm (e.g. compliance with policies on housing mix, affordable housing, landscaping, air quality, flood risk etc) does not trump the harm identified above. I have assessed the proposal in terms of the main issues and Appeal A falls short on one of the two main issues, which means that it does not comply with the development plan as a whole. For these reasons the proposal is unacceptable. That reasoning of course also applies to appeal B.

The Planning Obligations

65. The obligations – UU1¹⁸ and UU2¹⁹ – between them require the owner (The Duke and other trustees) to:
- (a) carry out the approximately £13M worth of heritage works within a maximum period of 27 years from first occupation of the dwellings including works to Syon House, the Lion Gate and lodges, historic tree planting and restoration of the carriage drive from Lion Gate;
 - (b) submit a Travel plan, provide a car club space on the appeal A site and prohibit occupiers of the new dwellings from applying for a parking permit within the Controlled Parking Zone;
 - (c) provide a construction training scheme as part of the appeal A scheme or a contribution of £77,000 to the Council for such training and to implement the Considerate Contractor scheme;
 - (d) restrict commencement of development on site A until all the new allotment plots are provided, in the event that appeal B is unsuccessful not to implement the appeal A scheme, and the submission of an Allotment Management Plan and its implementation.
 - (e) provision of 46 discounted market rental units to be let out at a 30% discount for the lifetime of the development and 81 open market private rental market (OMR) units; and
 - (f) submission of a viability appraisal where the development in appeal A has not been implemented within 2 years of the above date and a post-occupation review when 75% of the OMR units are occupied, and the

¹⁸ ID16

¹⁹ ID17

payment of a deferred contribution should a surplus arise from the review.

The Council has agreed these obligations with the appellant and confirms that together with the agreed list of conditions²⁰ they satisfactorily address refusal reasons 4 and 6 of appeal A.

66. For the reasons given in the Council's CIL Compliance Schedule²¹ I am satisfied that all the above obligations would meet the relevant tests in *The Community Infrastructure Levy Regulations 2010*. However, these obligations only come into effect if the appeals are allowed and so I make no further comment on them.

Other Matters

67. Local residents and TIS have raised a number of other matters, in particular objections related to increased traffic and highway safety and flood risk. However, the Council as highway authority and the Environment Agency have raised no objections to the appeal A scheme on these grounds respectively and I am satisfied that the scheme would not lead to significant increased congestion or highway safety issues and would not result in increased flood risk for its own occupiers or existing nearby occupiers. I am also content that none of the other objections raised, except the main issues above, constitute reasons for dismissing the appeals.

Overall Conclusion

68. For the reasons given above I conclude that both appeals should be dismissed because both proposals are contrary to local and national policy and the presumption in favour of the development plan is not outweighed by other material considerations.

Nick Fagan

INSPECTOR

²⁰ ID9

²¹ ID13

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY: *Edward Grant* of Cornerstone Barristers

He called
Sophia Laird MA, Conservation Officer, London Borough of Hounslow (LBH) – Heritage
Kiri Shuttleworth BSc (Hons) MA, acting Deputy Team Manager (West Team), LBH – Planning

FOR THE APPELLANT: *Sasha White* assisted by *Anjoli Foster* of Landmark Chambers

They called
Carl Vann BA (Hons), Grad Dip Arch, RIBA, ARB, Partner, Pollard Thomas Edwards – Design
Nick Bridgland MA (Hons), MA, FSA Scot, IHBC, Heritage Director, Lichfields – Heritage
Pauline Roberts BA (Hons), MSc, MRICS, MRTPI, Planning Director, Lichfields – Planning

FOR THE RULE 6 PARTY: *Charlotte Gilmartin* of 1 Crown Office Row

She called
Kate Harwood MA, The Gardens Trust – Syon Park heritage issues
Laurie Handcock MA, MSc, Icen Projects – Heritage
Christine Diwell, Secretary, The Isleworth Society (TIS) – Community issues including the allotments

INTERESTED PERSONS:

Annie Aloysius	Secretary, Park Road Allotments Association
Grace Gray	Local resident and allotment plot holder
Stephen Hurton	Chairman, Park Road Allotments Association
Nick Ferriday	Hounslow Friends of the Earth
Dr Daniel Vandenburg	Director, Hepple Close Management
Lynne McEvoy	Resident of Snowy Fielder Way
Thomas Elliott	Local resident

Vanessa Smith	Local resident
William Cran	Local resident
Cllr Tony Loucki	Ward Member for Osterley & Spring Grove and Member of Planning Committee
Rosemary Bunce	Committee Member of TIS
Peter Gallagher	Local resident
Chris Hern	Interested person
Anthony Agius	Hounslow Green Party
David Freeman	Local resident and allotment plot holder
Giles Denny	Resident of Snowy Fielder Way
Dr Valerie Snewin & Jane Perry	Local resident & plot holder respectively and authors of Vision for Park Road Allotments Site (Appendix 4 of TIS Proof of Evidence)
Jacki Thompson	Resident of Snowy Fielder Way

DOCUMENTS SUBMITTED AT THE INQUIRY

- 1 Appellant's Opening Submissions
- 2 Council's Opening Statement
- 3 Rule 6 Party (The Isleworth Society's) Opening Submissions
- 4 Up to date vacancy record on Park Road Allotments Site
- 5 Chronology of pre apps, apps & appeals
- 6 Email dated 3/10/18 from appellant's solicitors to LBH re. Lion Gate track and drive restoration works re Hotel S106
- 7 Map of allotments within/accessible to residents of Isleworth
- 8 Comprehensive list of drawings
- 9 Final list of agreed conditions for both appeals
- 10 Appellant's letter of 10/10/18 agreeing to imposition of any pre-commencement conditions
- 11 Council's Note on emerging Local Plan allocations
- 12 The Duke's Power of Attorney including to Colin Barnes, the Estate's Director and signatory of the two UUs
- 13 Council's CIL Compliance Schedule
- 14 Council's updated details of current allotments in the Borough (Table 1A, revision to Table 1 of KS's Proof of Evidence)
- 15 Email from Colin Barnes dated 18/10/18 summarising the obligations in the Unilateral Undertakings (UUs)
- 16 Signed UU 1 relating to Appeal A dated 19/10/18
- 17 Signed UU2 relating to Appeal B dated 19/10/18
- 18 Revised upper ground floor plan Blocks A & B
- 19 Revised upper ground floor plan Blocks C & D
- 20 Council's Closing Submissions
- 21 Rule 6 Party's Closing Submissions
- 22 Appellant's Closing Submissions
- 23 Appellant's response to Closing Submissions of Council & Rule 6 Party

Appendix 2 Extracts of relevant policy

Appendix 2 Relevant Planning Policies

CONTEXT AND CHARACTER

POLICY CC1 CONTEXT AND CHARACTER

Our approach

We will recognise the context and varied character of the borough's places, and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage.

We will achieve this by

- (a) Improving and promoting the appreciation of the character and qualities of the distinctive areas of the borough, by securing development that sensitively and creatively responds to an area's character and by refusing poor quality design;
- (b) Sustaining and conserving those areas which have a high quality, well established and coherent character that is sensitive to change;
- (c) Enhancing those areas which have a medium quality, mixed character and which would benefit from sensitive improvement and intervention;
- (d) Transforming those areas which have a low quality, poorly defined character and/or where an opportunity exists to establish a new coherent character, enhancing positive elements where they exist; and
- (e) Monitoring and updating the Urban Context and Character Study and ensuring the study informs any supplementary planning documents.

We will expect development proposals to

- (f) Have due regard to the Urban Context and Character Study and demonstrate how the proposal:
 - i. Responds to the design recommendations for each character area and urban type within which their development proposal is located.
 - ii. Responds to the wider context and history of the area, its communities, its natural landscape and its urban structure, form and function.
 - iii. Conserves and takes opportunities to enhance particular features or qualities that contribute to an area's character, e.g. mature trees.
 - iv. Provides opportunities to help form a new character or improve the poor aspects of an existing character that could benefit from enhancement; and
 - v. Responds to any local architectural vernacular that contributes to an area's character, for example bay windows.

CONTEXT AND CHARACTER

POLICY CC1 CONTEXT AND CHARACTER

We are taking this approach because

6.1 Successful, legible and loved places are those that provide a character that is easy to understand and relate to, and that buildings and the spaces created should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. The council shares the aspiration in the London Plan that the city should delight the senses, take care of its buildings and streets, and have the best of modern architecture, whilst making the most of its heritage assets.

6.2 The council has produced an Urban Context and Character Study which has identified, described and assessed the character and quality of the borough across its 11 study areas. This is a key part of the evidence base, which through extensive field survey work, historical research and input from local amenity groups, has identified areas in terms of design quality, sensitivity to and likelihood of change and suitability for tall buildings. In some areas, the character is well-defined with high-quality buildings and spaces that require cherishing and preserving, and where any change should be sensitive to this established character. In other areas the character is less defined, more mixed and generally lower quality, where opportunities to improve the character should be welcomed. A map of these areas can be found in the Urban Context and Character Study and will be subject to periodic updates.

6.3 The study also assists developers in understanding where a place has come from, where it is now, and where it is going and helps guide development proposals to respond sensitively to an area's character.



CONTEXT AND CHARACTER

POLICY CC1 CONTEXT AND CHARACTER

Supporting facts

How context and character is considered at the national, London-wide and local levels

- The NPPF makes it clear that local authorities should develop policies that are rooted in an understanding and evaluation of an area's defining characteristics.
- The London Plan Policy 7.4 and SPG on Context and Character sets out how LPAs must identify areas of different character and which ones should be protected, sustained and enhanced.
- The London Borough of Hounslow Urban Context and Character Study (2014) has established 232 character areas identified across 10 discrete study areas and one cross-cutting study area covering the entire borough. Each character area was surveyed, described, assessed and a response formed, covering which ones should be conserved, enhanced or transformed.



CONTEXT AND CHARACTER

POLICY CC1 CONTEXT AND CHARACTER

Notes

- Context can be defined as the way in which places, sites and spaces interrelate with one another whether physically, functionally or visually, or the way in which they are experienced sequentially and understood. Context is essentially 'what's there'.
- Character is created by the interplay of different elements, including the physical or built elements that make up the place, the cultural, social and economic factors which have combined to create identity, and the people associated with it through memories, association and activity. If context is essentially 'what's there', character is 'what it's like'.



CONTEXT AND CHARACTER

POLICY CC2 - URBAN DESIGN AND ARCHITECTURE

Our approach

We will retain, promote and support high quality urban design and architecture to create attractive, distinctive, and liveable places.

We will achieve this by

- (a) Ensuring proactive urban design forms an integral part of council development plans, programmes and processes, and prioritising design guidance for areas of change and intensification;
- (b) Working with applicants at an early stage (pre-application) to guide and shape the design of development proposals;
- (c) Reviewing built and proposed developments, decisions and advice to help raise design standards and awareness of the value of good design;
- (d) Working with housing providers to improve the design of estates as part of wider regeneration programmes;
- (e) Working with local communities to understand and improve the urban design of their areas through, for example neighbourhood plans; and
- (f) Using good practice guidance such as By Design, the Urban Design Compendium, the Mayor's Housing Design Guide, Mayor's Housing SPG, and Building for Life assessments.

We will expect development proposals to

- (g) Understand, integrate and where possible add to the natural landscape; including the topography, geology, existing features, landscape context, local flora and fauna and wider ecological setting of an area. Schemes should ensure that trees are suitably sited, protected during detailed design and construction, and provide amenity for the long term through effective maintenance arrangements;
- (h) Deliver the right land use mix, amount and density in the right places to support the rejuvenation of our town centres and the creation of healthy, diverse and varied places;
- (i) Create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate and feel safe during the day and night, with a particular focus on pedestrians and cyclists;
- (j) Function well in themselves and in their effect on surrounding areas, have a positive impact on the amenity of current and future residents, visitors and passers-by and help create Lifetime Neighbourhoods that foster social interaction and capital;

CONTEXT AND CHARACTER

POLICY CC2 - URBAN DESIGN AND ARCHITECTURE

(k) Respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings. The orientation of buildings and uses on sites to make best use of opportunities for passive design and access to daylight/sunlight should be considered;

(l) Provide a clear distinction between private, semi-private and public space, through an understanding of fronts and backs of buildings, ground floor uses, and continuity of street frontages and enclosure of space to help foster comfortable, usable and safe places;

(m) Provide a high quality, comfortable, safe and attractive public realm, well-integrated into its surroundings through using clear, well-defined boundary and building lines to address and animate the public realm;

(n) Ensure buildings and spaces are designed to stand the test of time and are easily adaptable and resilient to social, economic and technological change, and can accommodate movement and car parking in a safe and useable way;

(o) Promote and support contemporary architecture that responds intelligently to current and future lifestyles, needs and technology, whilst ensuring it's rooted in local context, at all scales;

(p) Promote low carbon design and incorporate energy efficiency measures that are themselves well integrated into the design and appearance of the development;

(q) Carefully consider external appearance, its composition and arrangement, through the use of high quality, durable materials and finishes and careful, considered detailing for building facades which add visual interest and richness to the street scene. A clear indication of how buildings are used and occupied should be presented, seizing opportunities for passive design wherever possible;

(r) Be designed to mitigate noise and air quality issues which significantly affect parts of the borough;

(s) Be designed so it is fully accessible to people with disabilities or impaired mobility;

(t) Provide adequate outlook, minimise overbearingness and overshadowing, and ensure sufficient sunlight and daylight to proposed and adjoining/adjacent dwellings; reduce reliance on single aspect dwellings, particularly if north facing, within noise bands C and D (as defined in the Noise Supplementary Planning Document) or containing 3 bedrooms or more; provide adequate levels of privacy and minimise direct overlooking through the careful layout, design and orientation of buildings and spaces; and

(u) Make well-designed provision for bicycles, and the acceptable storage of refuse, materials for recycling and composting and for convenient access for its deposit and collection in consultation with the council's waste services. Enclosures should be robust, well ventilated and attractively integrated with the building and screened for privacy and security.

CONTEXT AND CHARACTER

POLICY CC2 - URBAN DESIGN AND ARCHITECTURE

We are taking this approach because

6.4 Urban design considers how a building or area works, looks and feels. It includes the design and architecture of buildings and their relationship with the spaces between them, and the streets, squares, parks and linkages which form a whole greater than the sum of their parts. The quality of our buildings and public spaces is important as they form the backdrop for social and economic life. They can help or hinder, inspire or dull people's everyday lives. Achieving good design is critical to securing sustainable communities. Where this does not happen there can be negative long-term, social, environmental and economic impacts on an area.

6.5 The NPPF attaches great importance to the design of the built environment and states that good design should contribute positively to making places better for people. Design covers how an area functions, not just how it looks, and should be informed by an understanding of its prevailing character, history and identity. Development should create long-term value by investing in good design and high quality materials, to help ensure places can stand the test of time as evidenced by the appeal of historic areas and buildings that can be enjoyed across the borough.

6.6 The borough has a number of different physical and landscape characters, many of high quality, which attract residents, visitors and workers, such as Osterley and Syon Parks. Increasing the amount of new housing and development density, together with changes in work-type and car-use also means that development must use the principles of good urban design to absorb change appropriately. This includes intensifying and uplifting areas where there is room for improvement and change.

6.7 Across the borough, and particularly in growth areas, the council will work with partners to secure exemplary urban design and architecture and create high quality, distinctive places. The council will proactively manage growth and change, and work with applicants to explore and shape design issues through the pre-application process, ensuring that significant design matters such as layout and form are addressed at the earliest possible stage. The council aims to prepare more detailed design guidance for specific places (e.g. masterplans, urban design frameworks) and types of development or design topics (e.g. residential extensions guidance, streetscape guidance, tall buildings and amenity space). By working proactively with local people, developers and others, the council will ensure good design is embedded into its plans, programmes and development schemes from the outset.

6.8 Urban design and architecture are also important contributors to health outcomes, particularly through the encouragement of more active lifestyles. 'Active design' can be achieved through a range of measures, including: creating and maintaining mixed uses; encouraging walking and cycling; improving access to public transport; ensuring new development connects with existing parks and open spaces for recreation; providing facilities like showers and cycle storage that support exercise; and designing building exteriors and public realm that contribute to pedestrian friendly environments.

CONTEXT AND CHARACTER

POLICY CC2 - URBAN DESIGN AND ARCHITECTURE

Supporting facts

Defining urban design

Urban design can be defined as 'The art of making places. Urban design involves the design of buildings, groups of buildings, spaces and landscapes, in villages, towns and cities, and the establishment of frameworks and processes which facilitate successful development.' (From By Design: Urban design in the planning system: towards better practice)

Notes

- The borough is leading on significant public investment in Hounslow and Brentford town centres and along the Golden Mile where much of the work is focused on improving the urban design quality of the area through public realm and building works.
- For more information on urban design objectives see By Design, urban design in the planning system: towards better practice (DETR 2000)
- The Mayor's Housing SPG contains guidance on space standards, privacy, daylight and sunlight matters, whilst BRE guidance includes standards on sunlight and daylight in site layouts.
- Further information on active design is set out in Hounslow's Joint Health and Wellbeing Strategy and the Design Council's Active by Design - A Short Guide.



CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

Our approach

We will identify, conserve and take opportunities to enhance the significance of the borough's heritage assets as a positive means of supporting an area's distinctive character and sense of history.

We will achieve this by

- (a) Collating a borough-wide Heritage Strategy to guide a long-term, ambitious strategy for the continued conservation, enhancement and enjoyment of the significance of the borough's heritage assets, in consultation with the borough's local history societies and residents;
- (b) Conserving and taking opportunities to enhance the significance of the borough's network of designated and non-designated heritage assets and their settings, identifying new assets where appropriate and recognising the cumulative positive impact of heritage assets in a given area in consultation with the borough's local history societies and residents. We will use Article 4 directions where appropriate to enhance conservation of character or fabric;
- (c) Promoting heritage-led regeneration, particularly where this brings long term value and sense of place to development, such as in our town centres and along the Golden Mile. We will aim to secure the regeneration of heritage assets at risk, including those within Gunnersbury Park, Hanworth Park, Boston Manor House and the former Hounslow Powder Mills sites;

- (d) Working with Royal Botanic Gardens Kew World Heritage Site, London Borough of Richmond and Historic England to conserve and enhance the outstanding universal values of The Royal Botanical Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from this asset. This includes assisting in the implementation of the World Heritage Site Management Plan;
- (e) Promoting the appropriate re-use of historic buildings and supporting schemes that conserve the significance of, and provide the heritage asset with a sustainable, long-term use;
- (f) Working with our network of partners to ensure the borough's heritage is accessible, appreciated, valued and enjoyed by residents, workers and visitors;
- (g) Conserving and enhancing the strategic and local views identified in the Urban Context and Character Study that give the borough its character, visual richness and coherence; and by maintaining and updating a schedule of views; and
- (h) Conserving and enhancing the borough's beneficial and historic landmarks identified in the Urban Context and Character Study, which provide a strong visual and physical presence in the townscape.

CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

We will expect development proposals to

- (i) Conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance;
- (j) Retain, conserve and reuse a heritage asset in a manner appropriate to its value and significance;
- (k) Demonstrate that substantial harm to or loss of a heritage asset is avoided, unless exceptional circumstances can be demonstrated, consistent with the NPPF;
- (l) Demonstrate that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (see Glossary), this harm will be outweighed by the public benefits of the proposal, including securing its optimum viable use; or
- (m) Have regard to any harm to, or loss of, the significance of a non-designated heritage asset, including from both direct and indirect effects. Non-designated heritage assets include locally listed buildings, Archaeological Priority Areas and areas of special local character.

Buildings and structures

- (n) In the case of alterations, extensions or changes of use of a heritage asset a proposal should demonstrate that:
 - i. It is in keeping with the character of the building and harmonious with its surroundings and the wider character of the area; and, with particular respect to listed buildings or identified aspects of locally listed buildings, it preserves their special architectural or historic character and any features they may possess;
 - ii. It is of a high quality design and sympathetic in terms of scale and form to the original building and in the use of materials and other details to the period and style of the original building;

- iii. Opportunities to mitigate or adapt to climate change through the re-use or adaptation are maximised as long as this is not to the detriment of important aspects of character;
- iv. That it maintains the character of interiors and retain internal features of interest including layouts, methods and means of construction where these are important;
- v. That the original use is no longer viable and the benefits of the proposed use are demonstrated and would be in keeping with the character of the area; and
- vi. That a record is made and submitted of features of interest found, to be maintained and extended during works. Sustainability and salvage aspects should be factored into proposals.

CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

Conservation areas

- (o) Any development within or affecting a Conservation Area must conserve and take opportunities to enhance the character of the area, and respect the grain, scale, form, proportions and materials of the surrounding area and existing architecture; and
- (p) Retain and reuse any building in a conservation area which makes or can be adapted to make a positive contribution to the character of the area. Where a building makes little contribution to the area, consent for demolition will not be given unless there are approved plans for redevelopment or reuse of the land which will conserve and enhance the character of the area. Sustainability and salvage aspects should be factored into proposals.

World Heritage Site

- (q) Conserve and enhance the internationally recognised Outstanding Universal Value of the Royal Botanic Gardens Kew World Heritage Site, its buffer zone and its setting, including views to and from the site.

Sites of archaeological importance

- (r) We will expect the development proposal to submit an Archaeological Evaluation Report if the proposal falls within or adjacent to an Archaeological Priority Area;
- (s) We may require that an on-site assessment by trial work (archaeological field evaluation) is carried out before any decision on the planning application is taken; and
- (t) We will require any nationally important remains and their settings to be preserved permanently in situ, subject to consultation with Historic England as the borough's archaeological adviser. If preservation in situ is required the development proposal will need to accommodate this in the design.

Scheduled ancient monuments

- (u) Conserve and enhance a scheduled ancient monument and its setting if affected. Proposals must assess and submit an evaluation report if the proposal affects a scheduled ancient monument.

Strategic and local views

- (v) Conserve and enhance any strategic or local views identified in the Urban Context and Character Study and undertake a visual impact assessment to demonstrate no adverse impacts on the designated view or on views from Royal Botanic Gardens Kew World Heritage Site.

Registered parks and gardens

- (w) Consider adding to the list and encouraging preservation and enhancement through appropriate management measures.

Listed Buildings at Risk

- (x) Continue to assist with Historic England's Register of Heritage at Risk, adding items where necessary but seeking their removal by developing a proactive strategy for working with owners to ensure the continued conservation of the significance of the boroughs heritage assets.

CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

We are taking this approach because

6.12 The borough enjoys a network of heritage assets and aspects that defines its origins and illustrates distinctiveness. A heritage asset can be a landscape, place, building, monument or feature that has been identified as having special architectural or historic interest. Within the borough, these range from Grade I statutorily Listed Buildings such as Syon House, located with other listed buildings in registered Syon Park and lying within the 141ha of Isleworth Riverside's designated conservation area, to individual or groups of buildings that are locally listed for their contribution to an area's character. Outside the borough, the Royal Botanic Gardens Kew World Heritage Site lies in the London Borough of Richmond. Its international importance is set out in the Statement of Outstanding Universal Value and part of its buffer zone falls within the London Borough of Hounslow, Syon Park is specifically mentioned as being the focus of one of the garden vistas on the opposite banks of the Thames. Its setting includes, affects and contributes to the borough, including Syon Park. We have a duty to assist in preserving Royal Botanic Gardens Kew's outstanding universal value which includes a rich and diverse historic landscape and an iconic architectural legacy, which in turn provides benefit in views and character to, and recognition of, the assets of the London Borough of Hounslow.

6.13 The protection and enhancement of the historic environment is a core principle that as well a legal duty underpins sustainable development, as outlined in the NPPF. The borough's heritage assets are irreplaceable resources and are particularly sensitive to change and development, requiring special protection and careful treatment to sustain their value and importance for future generations. Development can impinge on the settings of the most important assets, whilst the value of lesser ones can be whittled away through attrition and incremental change. Alternatively their conservation and the sensitive reuse of heritage assets in regeneration and development proposals can act as an important catalyst, adding significant social, economic and environmental value and contributing positively to the quality and character of new development, and the value of the borough.



CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

Supporting facts

The borough's heritage assets

- The Context and Character Study has found that the character and identity of an area is heavily derived from its historical pattern of development, whether it's along the borough's historic Roman road and later incarnation as a great coaching route; its medieval pattern of lanes, villages, riverside settlements and the great estates; the effects of Hounslow Heath and the industrial revolution; its rows of Victorian terraced housing or art deco edged highways of the twentieth century; or the showpiece gems such as Boston Manor, Chiswick House, Osterley House and Chiswick Mall.
- Definitions of designated and non-designated heritage assets are provided in the Glossary (Appendix 2).
- Maps and descriptions of the Areas of Special Character and Archaeological Priority Areas can be found in the Urban Context and Character Study.
- The council will maintain and publish a List of Buildings of Local Townscape Character.



CONTEXT AND CHARACTER

POLICY CC4 HERITAGE

Notes

- Historic England has published a range of guidance to inform planning decisions relating to heritage, including the English Heritage Policy Statement - Enabling Development and the Conservation of Significant Places, Conservation Principles: Policies and Guidance (2008), The Repair of Historic Buildings (2005), Seeing the History in the View: A Method for Assessing Heritage Significance in Views (2011), The Setting of Heritage Assets (2011).
- The Royal Botanic Gardens Kew has published a range of guidance to inform planning decisions relating to heritage, including the Royal Botanic Gardens Kew World Heritage Site Management Plan (2011) and the Statement of Outstanding Universal Value.
- The Mayor of London has published the London's World Heritage Sites: Guidance on Settings Supplementary Planning Guidance, which provides further guidance on planning decisions near the World Heritage Site.



ENHANCING CONNECTIVITY

POLICY EC2 - DEVELOPING A SUSTAINABLE LOCAL TRANSPORT NETWORK

Our approach

We will secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being.

We will achieve this by

- (a) Promoting 'car-free' or 'low car' development where appropriate, as well as car clubs and car sharing schemes;
- (b) Promoting the active management of car parking and travel demand in the borough, particularly through the implementation of Controlled Parking Zones (CPZs) and restricting access to these zones to existing dwellings, and requiring developments to plan end-use in accordance with these measures;
- (c) Preparing site specific development briefs where strategic sites include existing car parks, to ensure that sufficient car parking is retained to meet local needs;

(d) Using the standards established in the London Plan for car parking, cycle parking, motorcycle parking, coach parking, and electric vehicle charging (or as updated by alterations to the London Plan). The London Plan specifies the maximum number of car parking spaces that developments should provide, having regard to the type of development and public transport accessibility. In suburban areas of low public transport accessibility the council may seek a provision of car parking at the maximum standard. The London Plan also specifies levels of cycle parking, however these are minimum standards and the council may seek a higher provision in certain circumstances; and

(e) Requiring proposals for vehicle crossovers to be consistent with the council's adopted policy on vehicle crossovers.

We will expect development proposals to

(f) Demonstrate they are located appropriately with regard to public transport accessibility and capacity, road capacity and access to good quality walking and cycling networks. Developments should provide a minimum number of cycle parking spaces and an appropriate maximum number of car parking spaces consistent with the standards in the London Plan;

(g) Demonstrate that adverse impacts on the transport network are avoided, including preparation of Transport Assessments for all major schemes, and providing contributions or improvements to transport networks;

(h) Demonstrate that sufficient public car parking remains or is re-provided in the area to serve local needs where there will be a reduction in off-street car parking. This could include consideration of available on-street car parking or involve the provision of an appropriate temporary facility. This should ensure that the development ultimately provides for existing local need, together with the resulting increase in demand arising from the development;

(i) Prepare Travel Plans in accordance with latest guidance from Transport for London and the council's '10 Point Guide' or any subsequently adopted guidance; and

(j) Incorporate design measures and facilities to promote cycling, in line with the London Plan.

ENHANCING CONNECTIVITY

POLICY EC2 - DEVELOPING A SUSTAINABLE LOCAL TRANSPORT NETWORK

We are taking this approach because

10.3 The growing number of people coming to the borough to live or work means the delivery of a sustainable transport network is crucial. The council's over-arching objective for transport, as set out in the Local Implementation Plan (LIP), is to 'enable all those who live in or visit the area to travel safely and conveniently, whilst supporting environmentally sustainable economic growth and improving health'. The proposals for new jobs and homes set out in the Local Plan will lead to more

frequent traffic congestion unless development includes travel management considerations. In addition, a stressed transport network will exacerbate existing air and noise pollution, whilst a lack of 'active travel' modes (i.e. walking and cycling) contributes to other health issues, such as obesity.

10.4 Whilst the delivery of strategic transport connections and other infrastructure set out in the LIP are important to achieving sustainable movement, new developments

will play an essential role, and therefore a suite of considerations shape planning outcomes. These include preparing transport assessments and travel plans, designing schemes so that they promote walking and cycling, managing car parking and improving the public realm, including through developer contributions. These measures will create a better environment for sustainable movement, and even where cars still have a dominant role, the promotion of car sharing, electric vehicles and improvements to the highway network will improve efficiency and environmental outcomes.



ENHANCING CONNECTIVITY

POLICY EC2 - DEVELOPING A SUSTAINABLE LOCAL TRANSPORT NETWORK

Notes

- 'Car-free' and 'low car' development will be encouraged in locations of high public transport accessibility and locations where there are Controlled Parking Zones (CPZs).
- Public Transport Accessibility Levels (PTALs) prepared by Transport for London provide a measure of the accessibility to a choice of modes in any given location in the borough. They can be used to assess the suitability of a scheme in a particular location.
- The council uses parking and traffic management controls to promote more sustainable uses of the borough's transport network, including Controlled Parking Zones (CPZs), which manage congestion, parking demand and pollution arising from vehicles in neighbourhoods. There are currently 16 CPZs operating in the borough.
- The London Plan includes cycle and car parking standards, plus standards for motorcycles, coaches, parking for persons with disabilities and electric vehicle charging.
- In addition to meeting minimum cycle parking standards, all cycle parking should be of high quality, covered, secure and integral to building design. It should also be easily accessible, by being located at ground floor level, close to entrances and/or building cores, having internal and external access, and avoiding vertical or semi-vertical stands which are not fully accessible. The size of cycle stores should be as small as is practical and ideally accommodate fewer than 50 cycles.
- Transport Assessments will be required for all major schemes, consistent with the London Plan. They should forecast trip generation and demonstrate that proposals are appropriate in the context of the site's PTAL, local road capacity and access to walking and cycling networks. They should also set out any require mitigation measures necessary to deliver an acceptable network solution, which may involve developer contributions, and measures to improve the attractiveness of sustainable modes. Unless otherwise specified by the borough, Transport Assessments should be developed in line with the latest guidance from TfL.
- Travel Plans will be required for certain types of development, in line with the London Plan, the Travel Planning for New Development in London guidance published by Transport for London, and any supplementary guidance prepared by the council. This presently includes a '10 point guide' for Travel Plans and separate guidance produced for schools and extensions to education facilities. Robust monitoring of travel plans is undertaken across west London by WestTrans, a consortium of the six west London boroughs.



ENVIRONMENTAL QUALITY

POLICY EQ1 - ENERGY AND CARBON REDUCTION

Our approach

We will move towards being a low carbon borough, by minimising the demand for energy and promoting renewable and low carbon technologies.

We will achieve this by

- (a) Promoting opportunities to secure carbon reductions where development comes forward, including through a potential Community Energy Fund to provide for allowable solutions, or a local carbon offset fund to provide local low carbon projects;
- (b) Encouraging developments to incorporate renewable energy and low carbon technologies; and
- (c) Working with partners to identify opportunities for carbon reductions and encouraging the take-up of opportunities to improve the energy efficiency of the existing built environment.

We will expect development proposals to

All developments

- (d) Meet the carbon emission reduction requirements set out in the London Plan.

All major developments

- (e) Connect to, or extend, existing decentralised heating, cooling or power networks in the vicinity of the site, unless a feasibility or viability assessment demonstrates that connection is not reasonably possible. Where networks do not currently exist, developments should make provision to connect to any potential future decentralised energy network in the vicinity of the site, having regard to opportunities identified through the London Heat Map and area specific energy plans;
- (f) Evaluate the feasibility and viability of Combined Heat and Power (CHP) systems and, where appropriate, examine the feasibility of extending the system beyond the site boundary, where developments cannot immediately connect to an existing heating or cooling network; and
- (g) Where appropriate make a financial contribution to an agreed borough-wide programme for carbon reductions where required reductions cannot be achieved on-site.

We are taking this approach because

9.1 Reducing carbon emissions in response to climate change is an established policy priority at the national, London-wide and local levels. The government's policy is for an 80% reduction in greenhouse gas emissions by 2050, and the London Plan seeks to achieve an overall reduction in the city's carbon dioxide emissions of 60% below 1990 levels by 2025. The council is seeking to achieve carbon reductions, both in its operations and across the borough. The built environment, including both new and existing buildings, is central to achieving these targets; this is particularly true for the borough, which is already developed and preparing for further growth. Energy consumption in the borough's housing stock alone is currently the second largest source of carbon emissions, accounting for 33% of the total.

ENVIRONMENTAL QUALITY

POLICY EQ1 - ENERGY AND CARBON REDUCTION

9.2 Building Regulations now set national policy for carbon emission reductions in new buildings and will, in step-changes, lead to zero carbon development by 2016 for housing and 2019 for non-residential uses. The means for achieving zero carbon development are evolving, but are likely to include opportunities for qualifying developments to contribute to off-site carbon reduction initiatives. Certainly, however, taking account of layout, building orientation, massing, materials and construction techniques to minimise energy consumption, as well as the use of renewable and low carbon energy technologies will be central to achieving reduced emissions. The London Plan includes detailed policies on these measures, and it is expected that these will be updated to reflect changes to national policy, along with the Mayor of London's Sustainable Design and Construction SPG. Innovative solutions will be encouraged, including the deployment of district heating networks where regeneration comes forward.

Notes

- Climate Change Act 2008 requires the net UK carbon account for the year 2050 to be at least 80% lower than the 1990 baseline.
- Energy Planning, the GLA's guidance on preparing energy statements, sets out how statements should be prepared to be consistent with the London Plan's energy policy. Developments should prepare energy statements consistent with this guidance or any subsequent updates.
- The means for achieving zero carbon development are emerging, though it is likely that development will need to meet certain low carbon standards through on-site measures called 'carbon compliance', and use 'allowable solutions' to mitigate remaining emissions to zero.
- 'Allowable solutions' would involve paying a third party to mitigate emissions on the behalf of developers using a suite of initiatives such as district heating or energy-to-waste schemes. To facilitate this, it is likely that Private Third Party providers of allowable solutions will come forward, and the council

may also choose to establish a body, known as a Community Energy Fund (CEF), to collect and spend monies on a locally managed list of solutions. Developers should refer to any supplementary guidance regarding allowable solutions, including the potential to contribute to a future Community Energy Fund, where it is proposed to use these to meet Building Regulations requirements.

- The council may also use other means to reduce emissions, including a Local Carbon Offset Fund. Should these come forward; supplementary guidance will set out expectations for development.
- The Carbon Reduction Evidence Base considers options for reducing carbon emissions, and identifies that Brentford and Hounslow town centres are suitable for local heat and power networks. This is supported by the London Heat Map report for the borough, which also identifies a number of schemes that may be viable.
- The District Heating Manual for London provides useful guidance for developers on the technical aspects of decentralised energy networks.

ENVIRONMENTAL QUALITY

EQ2 - SUSTAINABLE DESIGN AND CONSTRUCTION

Our approach

We will promote the highest standards of sustainable design and construction in development to mitigate and adapt to climate change.

We will achieve this by

- (a) Promoting sustainable design and construction, consistent with the principles established in the London Plan;
- (b) Using national standards for sustainable design and construction to assess environmental credentials of developments, and requiring schemes to meet specified levels as minimum; and
- (c) Encouraging the take-up of opportunities to improve the resource efficiency of existing homes and buildings through refurbishment to retrofitting, including through working with partner agencies such as Historic England to secure improvements in heritage assets.

We will expect development proposal to

- (d) Incorporate established principles for sustainable design and construction as set out in the London Plan, including passive solar design, water efficiency standards, sustainable drainage, the reuse and recycling of construction materials, green roofs and urban greening;
- (e) Be assessed against the standards for sustainable design and construction set out in Table EQ2.1 and submit relevant documentation to demonstrate that minimum specified levels are met or meet any national standards that subsequently supersede these; and
- (f) Prepare a sustainability statement, where major developments are proposed.



ENVIRONMENTAL QUALITY

EQ2 - SUSTAINABLE DESIGN AND CONSTRUCTION

Table EQ2.1: Standards for sustainable design and construction

Development in the borough will be expected to meet the following minimum standards, unless they are replaced by any applicable national standards.		
	New build	Refurbishments
Residential	All new development should meet the standards for sustainable design and construction set out in the London Plan, including any of the 'optional' Building Regulations requirements it adopts.	Major developments involving refurbishments should be assessed against BREEAM Domestic Refurbishments, and a rating of Excellent as minimum.
Non-residential	All new development over 500sqm should be assessed against BREEAM and meet a rating of Excellent as minimum.	Major developments involving refurbishments should be assessed against BREEAM Non-Domestic Refurbishments, and a rating of Excellent as minimum.

We are taking this approach because

9.3 Hounslow is a developed urban borough that will see further development of housing and other buildings to support new populations of residents and workers during the plan period. Therefore, the built environment has a significant role to play in climate change mitigation and adaptation. The opportunities for sustainable design and construction are rapidly evolving through innovation and advances to technology, and in turn feasibility. However, some of the underlying principles of sustainable design and construction are well established, and detailed in the London Plan and in guidance prepared by the council's other partners.

9.4 Sustainable design and construction requires the implementation of many of the policies included in the Local Plan, including those on climate change and carbon reduction, flood risk and surface water management, waste and pollution. However to ensure sustainability principles are embedded in future development in all locations, London Plan standards for sustainable design and construction, and national standards such as the Code for Sustainable Homes and BREEAM, will be used to measure performance, and minimum requirements will provide for consistent implementation and ensure that all developments contribute to sustainable development.

ENVIRONMENTAL QUALITY

EQ2 - SUSTAINABLE DESIGN AND CONSTRUCTION

Notes

- This policy sets out the overarching expectations for sustainable design and construction. Other policies, especially those in chapters 7 and 9, set out more detailed requirements on more specific sustainable design elements, such as climate change and carbon reduction, flood risk and surface water management, pollution and biodiversity.
- The government's Code for Sustainable Homes is the national standard for sustainable design and construction for housing. The Code assesses the sustainability performance of new developments in nine areas at the design (or interim) and post-construction stages and awards a rating, starting at Level 1 and increasing to Level 6 (zero carbon). Certificates for each dwelling are issued after assessments have taken place.
- In addition to meeting Level 4 of the Code for Sustainable Homes as minimum, specific credits for ENE 2 Fabric Energy Efficiency (five credits) and Mat 1 Environmental Impact of Materials (ten credits) should be met to address local air quality conditions.
- The London Plan requires residential development to be designed so that mains water consumption meets a target of 105 litres or less per head per day.
- The Building Research Establishment Environment Assessment Method (BREEAM) provides a similar measure for non-residential developments, also at the design and post-construction stages and awarding a rating of 'pass', 'good', 'very good', 'excellent' or 'outstanding'. It also includes nine elements.
- BREEAM Domestic Refurbishment has been developed to assess the sustainability performance of housing refurbishments, whilst BREEAM Non-Domestic Refurbishments is being developed for non-residential refurbishments and is expected to be operational in early 2014.
- BREEAM Domestic Refurbishment has been developed to assess the sustainability performance of large-scale neighbourhood schemes.
- A number of other standards can be used to assess the sustainability of development. BREEAM Communities can assess large-scale neighbourhood schemes and CEEQUAL can assess infrastructure and public realm projects. Where appropriate, the use of these standards in addition to those required in Table EQ2.1 will be encouraged.
- The Mayor of London has published a draft Sustainable Design and Construction SPD (2013), which provides further details on sustainable design and construction elements set out in the London Plan.
- Climate Change and the Historic Environment, produced by English Heritage (now Historic England), provides guidance on retrofitting historic and other older properties.



ENVIRONMENTAL QUALITY

POLICY EQ3 - FLOOD RISK AND SURFACE WATER MANAGEMENT

Our approach

We will ensure that flood risk is reduced by ensuring that developments are located appropriately and incorporate any necessary flood resistance and resilience measures. In addition, surface water will be managed through an increased emphasis on sustainable drainage.

We will achieve this by

- (a) Using the sequential and exceptions tests to inform planning decisions in flood risk areas to ensure inappropriate development is avoided;
- (b) Promoting improved surface water drainage across the borough, by working with partners to identify, manage and reduce the risk of surface water flooding;
- (c) Promoting the opening up of river corridors and making space for water through the creation of buffer zones to water courses and increasing floodplain connectivity;
- (d) Working with partners to ensure the provision and maintenance of flood defences, in line with the Infrastructure Delivery Plan;
- (e) Encouraging the take-up of opportunities to improve flood resistance and resilience in the borough's existing built environment, including drainage improvements, flood guards and raising electrical sockets and other vulnerable fittings; and
- (f) Working with the Environment Agency to implement actions of the Thames Estuary 2100 plan.

We will expect development proposals to

- (g) Prepare flood risk assessments, consistent with the requirements of the Environment Agency and the Strategic Flood Risk Assessment, and apply the sequential approach within site boundaries to ensure flood risk is further decreased;
- (h) Incorporate necessary flood resistance and resilience measures, including ensuring that adequate flood defences are in place and maintained through the lifetime of the development;
- (i) Incorporate sustainable drainage systems and avoid non-permeable hard standings with the aim of achieving greenfield runoff rates and being consistent with the Surface Water Management Plan; and
- (j) Where adjacent to the River Thames, demonstrate that they will not preclude future rising or set back of the defence as identified in the Thames Estuary 2100 Plan to ensure adequate flood protection for the lifetime of the development.

ENVIRONMENTAL QUALITY

POLICY EQ3 - FLOOD RISK AND SURFACE WATER MANAGEMENT

We are taking this approach because

9.5 Flood risk presents a major challenge for London, especially to boroughs like Hounslow, located on the River Thames. As such, a proactive approach to flood risk management is required, and planning can significantly reduce the risk of flooding by ensuring development is located appropriately and by promoting design that is flood resistant and resilient. Flooding can take various forms: tidal flooding (caused by surges in the Thames Estuary) and fluvial flooding (from other rivers, such as the Rivers Brent and Crane) are the most likely flood events, though flooding from surface water, sewers and groundwater also present risks.

9.6 The Strategic Flood Risk Assessment (SFRA) for the borough maps areas at risk from tidal and fluvial flooding, and is the basis for determining whether development proposals are appropriately located. A Surface Water Management Plan (SWMP) has been prepared to minimise surface water flooding, and this will be supported by the council's role in requiring developments to incorporate SuDS, consistent with national policy. The Environment Agency's Thames Estuary 2100 Plan also provides actions for boroughs that have a relationship with the River Thames, which seek to ensure that London is adequately defended in the long term. To manage all types of flooding, the council will work with the Environment Agency, who have statutory responsibility for flood risk and play a role in the development management process.

Supporting facts

The probability of flooding in the borough

Of the 96,000 properties in the borough, approximately 16,000 (or 15%) are at risk from flooding in the scenario of a 1 in 1,000 year event (0.1%). Most of these properties are located in Chiswick, Brentford and Isleworth, as the primary source of flood risk is tidal flooding from the River Thames (approximately 90%). However, it should be noted that the likelihood of flooding is low given the established flood defences locally and downstream (including the Thames Barrier). Smaller areas of the borough were exposed to fluvial flooding in the event of overflows from the rivers Brent and Crane (flooding of the latter occurred in 1965 and 1999).

ENVIRONMENTAL QUALITY

POLICY EQ3 - FLOOD RISK AND SURFACE WATER MANAGEMENT

Notes

- The SFRA sets out those parts of the borough that are at risk from flooding, and the extent to which flood events may impact the built environment. It should be used alongside the most recent flood risk mapping published by the Environment Agency to inform planning decisions.
- The aim of the sequential and exceptions test is to steer new development to areas with the lowest probability of flooding. Flood zones established in the SFRA and Environmental Agency mapping are the basis for these tests, and their requirements are set out in the NPPF Technical Guidance.
- Flood zones provide a guide for the probability of flooding. Zone 1 is considered low probability, Zone 2 is considered medium probability, Zone 3a is considered high probability and Zone 3b is considered part of the functional floodplain.
- Development proposals requiring a flood risk assessment include those located in Flood Zones 2 and 3 and those located in Flood Zone 1 of over 1ha. Flood Risk Standing Advice is available on the Environment Agency's website to inform these assessments.
- The Thames Estuary 2100 Plan was produced by the Environment Agency and sets out the strategic direction for managing flood risk in the Thames estuary to the end of the century and beyond. The plan groups local planning authorities into Action Zones, and provides specific guidance for each of these zones. The borough is included in Action Zone 0 (estuary-wide) and Action Zone 1 (west London), and development proposals should have regard to recommendations for these zones.
- The SWMP outlines the preferred surface water management strategy for the borough and includes consideration of flooding from sewers, drains, groundwater and runoff from land, small watercourses and ditches that could occur as a result of heavy rainfall. Development proposals should be consistent with the actions set out in the plan.
- The Flood Risk Regulations 2009 and the Flood and Water Management Act 2010 have increased the statutory responsibilities of unitary authorities. As a unitary authority, the borough is designated as a Lead Local Flood Authority (LLFA) and is also responsible for the preparation of a flood risk management plan and ensuring developments incorporate SuDS, consistent with national policy.



ENVIRONMENTAL QUALITY

POLICY EQ4 - AIR QUALITY

Our approach

We will seek to reduce the potential air quality impacts of development and promote improved air quality conditions across the borough, in line with the Air Quality Action Plan.

We will achieve this by

- (a) Assessing the potential air quality impacts of development proposals;
- (b) Encouraging air quality-sensitive development to be located in the most appropriate places, and requiring mitigation measures to minimise adverse impacts on end users through planning conditions; and
- (c) Ensuring that development does not exacerbate existing air pollution and wherever possible improves air quality, by promoting development that reduces and limits exposure to emissions through on-site mitigation and is 'air quality neutral', and through promoting sustainable design and seeking developer contributions where appropriate, consistent with the London Plan, the Mayor's Air Quality Strategy and the National Air Quality Strategy.

We will expect development proposals to

- (d) Carry out air quality assessments where major developments or change of use to air quality sensitive uses are proposed, considering the potential impacts of air pollution from the development on the site and neighbouring areas, and the potential for end users to be exposed to air pollution, consistent with requirements established in the Air Quality SPD, the London Plan and in government and European policy are met; and
- (e) Incorporate mitigation measures where air quality assessments show that developments could cause or exacerbate air pollution, or where end users could be exposed to air pollution.



ENVIRONMENTAL QUALITY

POLICY EQ4 - AIR QUALITY

We are taking this approach because

9.7 Air quality issues in the borough are well known. The council's Air Quality Action Plan (AQAP) designates the whole borough as an Air Quality Management Area (AQMA), and identifies road transport as the major source of air pollution, giving rise to nitrogen dioxide and particulate matter which can cause respiratory illnesses and other adverse health effects. Hounslow, like every local authority, has a statutory duty to work towards air quality targets established in the Mayor's Air Quality Strategy and in government and European policy.

9.8 Where development is proposed in areas of poor air quality, planning considerations are twofold. Firstly, the contribution that the development makes to air pollution requires careful consideration so as to avoid exacerbation of existing problems. This may mean, for example, that developments in certain areas that may attract a high number of vehicle movements, or contribute to emissions through the use of biomass, should be avoided. Secondly, the health and well-being of end users needs to be protected and maintained, and as such, specific measures regarding internal ventilation and air filtering may be required. Both of these considerations are particularly important in locations that exceed European Union limit values, and areas that currently exceed these limits include Great West Road, London Road, and Chiswick High Road.

9.9 There are also a number of other forms of air pollution. Odour pollution can impact on residential amenity and the attractiveness of neighbourhoods, and dust pollution, which often arises from construction, can also have health impacts. Developments should ensure that pollution from these sources is avoided.

Notes

- The council's Air Quality SPD sets out the information required for air quality assessments and further guidance on air quality considerations.
- Early assessment of the air quality environment is encouraged, as potential mitigation measures can have implications on the proposed design, construction and sustainability of proposals.
- Air quality assessments should demonstrate how exposure to pollutants would be reduced to within acceptable levels, including known uncertainty of the model used.
- Design and mitigation measures will usually be required through planning conditions.
- The council's AQAP is currently under revision, and progress reports are published annually
- AQMAs are designated where air quality objectives are not likely to be met, which in the case of Hounslow is the whole borough.
- European air quality policy is set out in Directive 50/2008/EC on ambient air quality and cleaner air for Europe. This requires exposure levels of harmful pollutants to be reduced and set out limit values which the borough should work towards.
- The London Plan requires developments to be 'air quality neutral', by using the best available techniques to be applied to minimise pollutant emissions.

ENVIRONMENTAL QUALITY

POLICY EQ5 - NOISE

Our approach

We will seek to reduce the impact of noise from aviation, transport and noise-generating uses, and require the location and design of new development to have considered the impact of noise, and mitigation of these impacts, on new users and surrounding uses according to their sensitivity.

We will achieve this by

- (a) Assessing the potential noise impacts of development proposals where they are located near to noise-sensitive uses (such as housing) or existing sources of noise;
- (b) Directing noise-sensitive development to locations outside those areas identified where noise exposure is likely to cause adverse effects in terms of public health and well-being and children's cognitive learning in schools;
- (c) Ensuring noise-sensitive development is protected against existing and proposed sources of noise through careful design, layout and use of materials, adequate insulation of the building envelope (including both internal/external walls and ceilings), as well as protecting external amenity areas;

(d) Encouraging the uptake of measures to decrease noise nuisance in the built environment, including working with Heathrow Airport to improve conditions for households and other noise-sensitive uses exposed to high levels of noise, consistent with the Aviation Policy Framework; and

(e) Considering the designation of Quiet Areas and identifying and protecting areas of tranquility which have remained relatively undisturbed by noise and are valued for their recreational and amenity value for this reason.

We will expect development proposals to

- (f) Carry out noise assessments where major schemes or a change of use to a more noise-sensitive use are proposed, detailing on site noise levels both internally and in any external amenity space, and the potential impact of the development on surrounding uses;
- (g) Minimise noise disturbance from adjoining uses by incorporating sound insulation or alternative forms of noise barrier, using appropriate materials and arranging and locating rooms appropriately (such as through stacking rooms of similar use above/adjacent to each other), including where conversions or change of use are proposed;

(h) Ensure that noise mitigation measures are implemented, to demonstrate compliance with British Standard BS8233: 2014 - Guidance on sound insulation and noise reduction for buildings, as appropriate;

(i) Demonstrate that new plant and machinery (including ventilation) do not harm the amenity of neighbouring properties and generate noise level that is at least 10dB below the background noise levels; and

(j) Be located outside of the 69 dB LAeq 16hrs noise contour of Heathrow Airport where noise-sensitive uses (i.e. residential, nursing/care homes, schools/educational establishments, hospitals/healthcare facilities) are proposed, consistent with Section 2 of the International Civil Aviation Organisation (ICAO) Balanced Approach to Aircraft Noise Management which directs residential developments outside this contour.

ENVIRONMENTAL QUALITY

POLICY EQ5 - NOISE

We are taking this approach because

9.10 The principle sources of noise pollution in the borough are aircraft arrivals and departures and ground operations at Heathrow Airport, causing particular concerns in the west of the borough. Road transport also causes noise nuisance, particularly along major arterial roads such as the A4 and M4, and other disturbance can come from noise generating uses such as industrial and commercial operations, food, drink and entertainment establishments and a building's plant and equipment. In addition, noise pollution can arise from vibration. All these sources of noise pollution can have a serious effect on human health, and therefore development should seek to avoid and mitigate noise nuisance.

9.11 The approach to minimising noise impacts is twofold. Firstly, noise generating development, and proposals for developments near existing sources of noise, should be designed such that disturbance is avoided. The use of noise impact assessments, and assessing potential noise nuisance using recognised measures such as British Standards, should be used to

prevent and mitigate noise. Secondly, planning decisions should consider the context of the built environment, including established sources of noise pollution. This approach is particularly relevant in the borough, where noise from Heathrow Airport's operations calls for land-use planning to have a role in reducing noise, as set out in the government's Aviation Policy Framework. In this regard, the council has a role in ensuring noise nuisance is not exacerbated by placing sensitive uses outside of higher noise contours. Noise contour mapping shows those parts of the borough affected by aircraft noise, rising from 57 dB LAeq 16h to 72 dB LAeq 16hr. Consistent with the ICAO Balanced Approach and advice from the airport operator, noise-sensitive development should be located outside the 69dBA LAeq16h contour, and in the case of family housing and non-residential noise-sensitive development, also outside of the 63dBA LAeq.

9.12 The council is working with adjacent boroughs to develop further guidance on managing noise arising from and sensitive to new development, and will continue to work with other stakeholders, including Heathrow Airport, to manage the impacts of noise.



ENVIRONMENTAL QUALITY

POLICY EQ5 - NOISE

Notes

- The council is producing a Development Control for Noise Generating and Noise-sensitive Development SPD with the London Boroughs of Hillingdon and Richmond, which will provide guidance on the location and design of new development with regard to noise (expected 2014).
- The council's draft Air Quality SPD (2013) provides guidance on noise considerations.
- British Standard BS8233: 2014 - Guidance on sound insulation and noise reduction for buildings, BS 4142:2014 (Method for Rating and assessing industrial and commercial sound and BS 6472-1:2008 (Guide to evaluation of human exposure to vibration in buildings) should inform noise assessments.
- Noise generating uses (such as industrial and commercial operations, food and drink establishments and other town centre uses) can impact on surrounding residential properties. It may be appropriate to restrict hours of operation, deliveries and refuse and recycling collection.
- Noise pollution includes vibration, and planning should limit human exposure to vibration under the Control of Pollution Act 1974, Part III, which gives local authorities powers to control noise from construction sites, and the Environmental Protection Act 1990, Part III (as amended by the Noise and Statutory Nuisance Act 1993), which requires local authorities.
- Abatement notices will be served where noise emitted from any premises, or from vehicles, machinery and equipment in the street, constitutes a statutory nuisance.
- The Aviation Policy Framework sets out the government's policy on the noise impacts arising from aviation, including planning considerations that may be a material consideration in planning decisions. The framework expects airport operators to offer households exposed to levels of noise of 69 dB LAeq 16h or more, assistance with the costs of moving, and to offer acoustic insulation to noise-sensitive buildings, such as schools and hospitals, exposed to levels of noise of 63 dB LAeq 16h or more.
- Between the 69dBA LAeq and 63dBA LAeq contours there will be a presumption against family housing, whilst other smaller one bed and studio housing will only be accepted where high levels of sound insulation and ventilation are provided. There will also be a presumption against non-residential noise-sensitive development in this zone. In addition, between 63 and 57dBA LAeq contours all new built development, including residential extensions, should have high levels of sound attenuation and acoustically treated ventilation. The ICAO Balanced Approach encompasses four principal elements: reduction of noise at source; land use planning and management; noise abatement operational procedures; and operating restrictions on aircraft.
- The Aerodromes (Noise Restrictions) (Rules and Procedures) Regulations 2003 transpose European Directive 2002/30/EC on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Community airports into United Kingdom law. The regulations apply to major airport operators with over 50,000 civil jet aircraft movements a year (which includes Heathrow Airport) and reflect the adoption of the ICAO balanced approach to managing aircraft noise. Management of noise by Local Planning Authorities is also an element, and the borough considers that the 69 dB (A) LAeq 16h contour represents a Significant Observed Adverse Effect Level (SOAEL). As such, residential developments within this area are not permitted.

ENVIRONMENTAL QUALITY

POLICY EQ7 - SUSTAINABLE WASTE MANAGEMENT

Our approach

We will work with the West London Waste Authority boroughs to meet our waste apportionment, whilst promoting the prevention, re-use, recycling and recovery of waste, consistent with the waste hierarchy.

We will achieve this by

- (a) Working with the West London Waste Authority boroughs to manage the borough's London Plan waste apportionment as set out in the West London Waste Plan;
- (b) Promoting improvements to wastewater infrastructure, including the Mogden Sewage Treatment Works; and
- (c) Providing in-principle support for proposals for new sewage and wastewater infrastructure, including the Thames Tideway Sewer Tunnels.

We will expect development proposal to

- (d) Incorporate suitable arrangements for waste management, including the location, size and design of waste and recycling facilities, and transport access.

We are taking this approach because

9.14 London is moving towards waste self-sufficiency, an aim to manage as much of its waste within London as practicable, and sending zero biodegradable and recyclable waste to landfill by 2031. To achieve this, the borough has adopted the West London Waste Plan (WLWP) in partnership with the West London Waste Authority boroughs of Brent, Ealing, Harrow, Hillingdon and Richmond. This sets out how the boroughs manage their waste apportionment requirements set out in the London Plan. For Hounslow, this means managing 288,000 tonnes each year to 2036. The West London Waste Plan protects existing waste facilities and identifies sites for waste management in the west London boroughs.

Notes

- The 'waste hierarchy' ranks five steps for dealing with waste. Prevention is at the top of the hierarchy, followed by re-use, recycling, recovery and finally disposal in terms of environmental preference. The hierarchy is established in the EU Waste Framework Directive and transposed into UK law by The Waste (England and Wales) Regulations 2011.

9.15 Another component of waste management is sewage and wastewater treatment. The Mogden Sewage Treatment Works is a regionally significant treatment facility in the borough, and has traditionally been a source of odour pollution for residents in Hounslow town, Isleworth and beyond. In recent years capacity increases have been accompanied by on-site improvements including odour and mosquito mitigation, and a waste-to-energy scheme that generates much of the site's energy needs. Improved capacity will also be delivered by the Thames Tideway Sewer Tunnels, which includes a west London to east London system that runs underground through the borough. The borough is working with Thames Water, who is delivering this scheme, in recognition that it forms a major infrastructure investment.

- Thames Water prepared a Development Consent Order (DCO) for the Thames Tideway Sewer Tunnels, which was considered by the Planning Inspectorate and consented in September 2014.
- London Plan Policy 5.17 protects existing waste facilities and seeks to facilitate their maximum use, and also sets out criteria for determining waste-related applications. These policies are further detailed in the West London Waste Plan.

ENVIRONMENTAL QUALITY

POLICY EQ8 - CONTAMINATION

Our approach

We will ensure that contamination is properly considered and promote the remediation of land where development comes forward, consistent with the council's Contaminated Land Strategy and the NPPF.

We will achieve this by

- (a) Assessing development proposals to determine the suitability of the proposed use in relation to conditions on site;
- (b) Promoting the remediation of contaminated or potentially contaminated land, and the improvement of land conditions and water quality in all areas, as regeneration takes place and development proposals come forward; and
- (c) Supporting the provision of infrastructure for decontamination and soil remediation.

We will expect development proposals to

- (d) Present adequate site investigation information, including an assessment of the site's history, potential contamination sources, pathways and receptors, and where appropriate, physical investigation, chemical testing, assessment of ground gas risks and assessments of risks to groundwater;
- (e) Present proposals for the control of any risks from contamination that may be present;
- (f) Demonstrate that contamination has not been caused during development, including demonstrating that imported materials are of suitable quality;
- (g) Have regard to sustainability considerations where remediation is required, including controlling the quantities of material removed from or imported to the site;
- (h) Present evidence to demonstrate that following completion the risks from contamination have been controlled effectively in accordance with the development proposals; and
- (i) Ensure that the contamination of water is avoided, and where possible include measures to improve water quality through sustainable design and construction.

ENVIRONMENTAL QUALITY

POLICY EQ8 - CONTAMINATION

We are taking this approach because

9.16 The borough has been home to a wide variety of uses throughout its history, including industrial uses, landfill, military operations and gas works. These uses have led to the potential for contamination on many sites, through the deposition of waste materials including putrescible waste, onsite chemical spillages, the burning of materials, leaks from fuels or chemical tanks and a range of other processes. Across London, the redevelopment of previously developed land is encouraged as a means of providing remediation and making full use of available land, and can also improve water quality. Those undertaking development have a duty to ensure that where a site is affected by contamination or land stability issues, a safe development is secured.

Notes

- The council will review development proposals and may require measures to assess and mitigate any risks to health and the wider environment from contamination where permission is granted.
- Site investigations should be carried out by a competent person, and the extent of investigation required will depend on the size and type of development proposed and the history of the site.
- Developments consisting of residential or small commercial extensions, or replacement of a single domestic dwelling where contamination is not known or suspected to be present will not normally require investigation. However, where there is reason to suspect that contamination is present then investigation will be required.
- Desk-based investigations should normally identify the historic use of the development site, the contamination sources which may be associated with the site, the risk they may pose to a proposed development and what further investigatory and remedial works are required.
- Remedial works may be completed during the course of development or in certain cases extend after construction has finished where this is the most technically appropriate solution.
- There is a large body of standards and guidance published by government and industry groups relating to the investigation and remediation of land affected by contamination and this should inform development proposals.
- Demonstration of successful remediation is likely to involve the production of a verification report including relevant information such as the results of validation testing, waste transfer documentation, and certification of correct installation of any gas or vapour barriers used.
- The council's Contaminated Land Strategy guides its work on the control of risks from contamination, in line with Part 3a of the Environmental Protection Act 1990.
- The Environment Agency's Groundwater Protection: Principles and Practice (GP3) considers the risk of water contamination through development, and suggests that certain uses are located an appropriate distance from receptors known as Source Protection Zones (SPZs).
- The Water Framework Directive promotes the remediation of contaminated land as a means of achieving water quality improvements.
- Development should include drainage designs and piling that do not pose a risk of mobilising contaminants, and promote improvements to water quality through sustainable design and construction.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB2 - OPEN SPACE

Our approach

We will protect and enhance Local Open Space.

We will achieve this by

- (a) Designating and protecting Local Open Space as shown on the Policies Map, in line with the NPPF and the London Plan;
- (b) Protecting and enhancing Local Open Space, addressing deficiencies in quality, quantity and access;
- (c) Maintaining the supply of Local Open Space to meet the needs of the borough's growing population, by expecting on-site provision of publicly accessible open space, particularly in major new developments in areas of deficiency;
- (d) Encouraging the provision of an appropriate balance and mix of open space types specific to meet needs in different parts of the borough, with specific reference to increasing the provision of parks and gardens;
- (e) Protecting quiet and tranquil areas of Local Open Space that are relatively undisturbed by noise and are valued for their recreation amenity attributes; and
- (f) Working with partners, friends groups, other stakeholders and the general public to improve and enhance the quality of and access to Local Open Space.

We will expect development proposals to

- (g) Protect existing Local Open Space from development, especially where it would lead to a deficiency in publicly accessible open space, unless it satisfies the criteria for such development in the NPPF in that: it has been assessed as clearly surplus to requirements; or it would be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreational provision, the need for which clearly outweighs the loss;
- (h) Avoid the loss of or encroachment upon Local Open Space, or intrusion into an open aspect. Development ancillary to the open space use must preserve its predominantly open character; and
- (i) Enhance the provision of publicly accessible Local Open Space in the borough, especially in areas of open space deficiency as identified on an annual basis through Annual Monitoring Reports Major developments should achieve this through onsite provision wherever possible, particularly in areas of substantial change and intensification.



GREEN AND BLUE INFRASTRUCTURE

POLICY GB2 - OPEN SPACE

We are taking this approach because

7.4 Together with the borough's Green Belt and Metropolitan Open Land, Local Open Spaces are integral to the character and image of the borough, breaking up the built environment, and adding to local context and amenity. They make an important contribution to the health and well-being of borough residents, providing space for sport, physical activity and play, as well as tranquil spaces for quiet recreation.

7.5 Local Open Space is a key element of green infrastructure and plays a role in providing habitats and biodiversity, and boosting environmental resilience by helping to control flood risk and mitigating the risks of climate change. The borough's open spaces provide green connections around and beyond the borough as part of the network making up the Mayor of London's All London Green Grid, for use by people and wildlife.

7.6 The majority of open spaces in the borough are highly valued by local residents for their landscape, heritage, biodiversity or space for recreation, and provide areas for community activities and cultural events. In this respect, they can help aid community involvement and the general well-being of residents. As such, the provision of open space relative to the population will be kept under review and considerations of whether Local Open Space be regarded as surplus in accordance with paragraph 7.4 should take into account the needs arising from future population growth.



GREEN AND BLUE INFRASTRUCTURE

POLICY GB2 - OPEN SPACE

Supporting facts

Open space in the borough

The borough has 349ha of Local Open Space which plays a particularly important role in providing for recreation and amenity, or adds to local context and character.

As the population in Hounslow is set to grow by around 30,000 people to reach 280,000 by 2030, Local Open Space will need to be protected, alongside Green Belt and Metropolitan Open Land, to ensure that provision meets the needs of future residents.

Despite there being a good overall level of open space, the quantity, quality and access varies substantially across the borough, with areas of deficiency that new development and other projects should help to tackle. These are assessed in detail in the open space evidence base and summarised as follows:

Quantity of open space

Chiswick, Central Hounslow and Cranford and Heston have less open space in relation to their population than the rest of the borough. This means that open spaces in these areas are already intensively used, and this will be exacerbated by new development. It is therefore important that development proposals in these areas seek to provide open space on-site to ensure quantity deficiencies are addressed and not worsened.

Access to open space

Publicly accessible open space deficiency is mapped using 400m catchment areas. Barriers to access also present problems in certain parts of the borough due to severance by major transport arteries, such as roads and railways. The open space evidence base identifies the most significant deficiency areas in Brentford, Isleworth, Central Hounslow and Cranford and Heston. Development should therefore seek to address existing deficiencies in access to open space, and not result in a loss of open space leading to increased deficiency. A Publicly Accessible Open Space Deficiency map which takes account of barriers to access, will be published and updated through the Annual Monitoring Report.

Quality of open space

The west of the borough contains the greatest number of low quality open spaces, followed by Cranford, Heston and Chiswick. This highlights current management issues, both where there are extensive areas of land to maintain in the west area, and also where high intensity of use may already be leading to poorer quality environments e.g. in Cranford, Heston and Chiswick. Investment and improvements should be focused to address issues of low quality.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB2 - OPEN SPACE

Notes

- The NPPF highlights the importance of open space and protects these spaces from development. The Local Open Space designation identifies those areas of open space that are more accessible or provide a particularly important role in recreation, leisure and context and character.
- The London Plan and the Mayor of London's Green Grids SPG provide further detail on Green Infrastructure, particularly outlining the approach that Local Plans should take to identify and tackle deficiencies and ensure that future open space needs are met in areas of substantial change, regeneration and intensification.
- The Open Space Assessment: (also known as the PPG17 study) is consistent with the NPPF and national planning practice guidance, which require an assessment of the borough's open space, sports and recreational facilities. This assessment contains mapping of open space typologies and further detail on borough-wide and local deficiencies.
- The Open Space Background Paper assesses local open space needs and identifies areas of deficiency in line with the public open space categorisation, or hierarchy, in the London Plan.
- Quiet and tranquil areas are defined as areas that have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason in the NPPF, with protection given in both the NPPF and the London Plan.
- Proximity to significant sources of noise or air pollution can have a negative impact on the usability of Local Open Space for off-site amenity provision.



GREEN AND BLUE INFRASTRUCTURE

POLICY GB4 - THE GREEN INFRASTRUCTURE NETWORK

Our approach

We will protect and enhance the green infrastructure networks throughout the borough, particularly those identified as part of the Mayor of London's All London Green Grid. The network will be improved to maximise the diverse benefits and multiple functions, and improved public access to, and links between open spaces will be encouraged.

We will achieve this by

- a) Identifying and protecting the existing green infrastructure network, including the grid identified in the Mayor of London's All London Green Grid SPG;
- b) Working with partners to deliver projects that enhance and maximise the benefits of the green infrastructure network. We will also promote the development of new green chains and corridors where these can benefit local residents and biodiversity, and contribute to wider environmental resilience; and
- c) Promoting projects to improve access to the green infrastructure network and accessibility between open spaces, to form a network for sustainable travel, consistent with the council's Greenways and Quietways initiatives.

We will expect development proposals to

- (d) Make a positive contribution to the green infrastructure network by improving its quality, functions, linkages, accessibility, design and management;
- (e) Incorporating elements of green infrastructure on site to integrate into the wider network of green infrastructure, and assist in the greening of the borough. This may include provision of green roofs, sustainable drainage systems, trees, squares, plazas and pedestrian access routes; and
- (f) Demonstrate that there will be no significant adverse impact on the borough's green infrastructure.

We are taking this approach because

7.10 The green infrastructure network provides multifunctional benefits, including links to places both within and beyond the borough. These links encourage walking and cycling, and enable movement of wildlife. The green infrastructure network includes a number of parks, walkways and other spaces and within the borough, large parts of the green infrastructure network closely relate to the Blue Ribbon Network, particularly the River Thames, the River Brent and the River Crane. These are identified as green grid areas in the Mayor of London's All London Green Grid SPG, highlighting the diversity of the borough's green and blue landscapes and environments.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB4 - THE GREEN INFRASTRUCTURE NETWORK

Supporting facts

Green infrastructure network

The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.

The borough's green infrastructure network includes its open spaces and nature conservation areas, as well as residential gardens which play an important role in connecting green spaces across urban areas. Green links in the borough include the River Thames, River Brent and Grand

Union Canal, the Crane Corridor and Duke of Northumberland's River, which connect with adjoining boroughs and districts. The quality and access to and within green chains and corridors varies across the borough, from the relatively well-maintained Thames Path (a National Trail) to less well maintained areas in the west of the borough and around the River Brent and Grand Union Canal. Greenways and Quietways are two initiatives being taken forward by the council to improve sustainable travel and maximise the use of green chains and corridors.

Hounslow Biodiversity Action Plan (2011-2016)

The borough's Biodiversity Action Plan provides strategic overview of biodiversity in the borough, and provides detail on habitats across the borough. It highlights and prioritises issues and actions to protect, conserve and enhance wildlife. These priorities and actions should be taken into account when enhancements to the green infrastructure network and Green Grid Areas are proposed.

Mayor of London's All London Green Grid SPG

London Borough of Hounslow is split between three Green Grid areas identified in the Mayor's SPG. These are:

- Arcadian Thames (Green Grid Area 9);
- River Colne and Crane (Green Grid Area 10);
- Brent Valley and Barnet Plateau (Green Grid Area 11).

Partnership working

The council is committed to working in partnership to promote green infrastructure and green grids, and projects that improve them. The council is committed to working with the following groups:

- Hounslow Biodiversity Action Plan Partnership;
- Thames Landscape Strategy and Thames Strategy Kew to Chelsea;
- Crane Valley Partnership; and
- Brent Catchment Partnership.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB4 - THE GREEN INFRASTRUCTURE NETWORK

Notes

- The Mayor of London outlines the approach to London's network of Green Infrastructure in the All London Green Grid SPG which includes maps, and the approach to urban greening, green roofs and sustainable drainage.
- The borough's Biodiversity Action Plan provides details on habitats and prioritises issues and actions to be taken forward. It also monitors progress on actions to ensure gauge delivery of actions.



GREEN AND BLUE INFRASTRUCTURE

POLICY GB7 - BIODIVERSITY

Our approach

We will protect and enhance the London Borough of Hounslow's natural environment and seek to increase the quantity and quality of the borough's biodiversity.

We will achieve this by

- (a) Permitting development only where it can be shown that significant adverse impact on biodiversity is avoided, mitigated, or as a last resort, compensated;
- (b) Protecting designated international, national and local nature conservation areas, as set in supporting facts, and supporting new designations;
- (c) Promoting the qualitative enhancement of biodiversity sites, including improvements to access, connectivity and the creation of new habitat;
- (d) Working with partners, including the Hounslow Biodiversity Partnership, the Crane Valley Partnership, the Brent Catchment Partnership and the Thames Landscape Strategy to improve conditions for biodiversity; and
- (e) Encouraging the greening of the borough, through landscaping and tree planting, and protecting existing trees through Tree Preservation Orders (TPOs).

We will expect development proposals to

- (f) Contribute to the greening of the borough, by incorporating green roofs and walls, landscaping, tree planting and other measures to promote biodiversity such as bat and bird boxes, through the preparation of ecological plans and strategies where major developments are proposed, thereby resulting in a gain for biodiversity in the borough; and
- (g) Contribute to the action plans set out in the Hounslow Biodiversity Action Plan.

We are taking this approach because

7.14 Despite being developed, the borough's significant open space, plus its location on the River Thames, provides the borough with diverse habitats and a rich wildlife resource. This includes 954ha of open space managed wholly or partly for nature conservation, with many other areas and the built environment also hosting incidental species and habitats. As well as hosting sites that are of importance to the local communities, the borough includes areas of nature conservation that have national, European and international protection, as set out in the supporting facts. The future development planned for the borough will place pressure on these habitats. However it also presents opportunities for the creation of new habitats and improvements to existing sites. The provision of new habitats should focus on priority habitats and should give consideration to native and priority species taking into account the species' adaptability to climate change.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB7 - BIODIVERSITY

7.15 To prevent the degradation of natural habitats, designated sites will be protected, and development proposal must demonstrate that they do not cause adverse impacts, whilst contributing to their qualitative improvements through providing better access or on-site improvements. Open space provision in development provides an opportunity to create new habitats through landscaping, tree planting and the retention of existing trees, and innovative design features such as green roofs, artificial nesting structures for bats or birds, and rain gardens.

Supporting facts

The borough's biodiversity designations

Special Protection Areas (SPAs) and Ramsars

SPAs are European designations that protect rare and vulnerable birds, whilst Ramsar sites are international designations that promote the conservation and sustainable use of wetlands. The Kempton Nature Reserve is part of the South West London Water Bodies SPA and Ramsar site.

Sites of Special Scientific Interest (SSSIs)

SSSIs are national designations that protect the country's best wildlife and natural assets, supporting rare and endangered species and habitats. The Kempton Nature Reserve and Syon Park are both SSSIs.

Sites of Importance for Nature Conservation (SINCs)

SINCs are local designations that protect sites of local wildlife importance. There are 47 SINCs in the borough, which are then classified for their importance to include: 11 Sites of Metropolitan Importance; 14 Sites of Borough Importance - Grade I; 11 Sites of Borough Importance - Grade II; and 11 Sites of Local Importance.

Local Nature Reserves (LNRs)

LNRs protect wildlife or geological features that are of special interest locally, and are designated by Natural England. There are ten LNRs in the borough covering 163ha, the largest being Hounslow Heath.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB7 - BIODIVERSITY

Notes

- This policy sets out the overarching strategy for biodiversity. However other policies, including those in Chapter 7 covering open space and the Blue Ribbon Network, and Chapter 10, covering sustainable design and construction, also have regard to biodiversity.
- Planning guidance will be produced for developers to outline the general principles of what the council expects from developments with regard to biodiversity, as well as the ecological surveys and assessments that should accompany planning applications.
- The Hounslow Biodiversity Action Plan promotes habitat management. The BAP is produced and implemented by the Hounslow BAP Partnership, which is coordinated by the council.
- The council participates in two Thames Landscape Strategy groups (Hampton to Kew and Kew to Chelsea), which bring together local planning authorities and other statutory and non-statutory stakeholders in the sub-region to collaborate on enhancement projects, education and policy.
- The Crane Valley Partnership includes local authorities and other agencies, and works to enhance the River Crane corridor. The Brent Catchment Partnership includes similar partners, and works to enhance the River Brent corridor.
- Greenspace Information for Greater London (GIGL) holds the boroughs biodiversity records for all flora and fauna.
- There are a number of nature conservation sites and open spaces in the borough that are part of an Environmental Stewardship Scheme and managed by the council
- SPAs are designated by government in collaboration with the Joint Nature Conservation Committee, pursuant to EC Directive on the conservation of wild birds (79/409/EEC).
- Ramsar sites are designated by central government, pursuant to the Ramsar Convention.
- SSSIs are designated by Natural England, pursuant to the Wildlife and Countryside Act 1981.
- SINCs are designated by the Hounslow BAP Partnership in consultation with the Local Wildlife Sites Board, and protected through local plans.
- LNRs are designated by local authorities under the National Parks and Access to the Countryside Act 1949.
- Government consulted on proposals for biodiversity offsetting in September 2013. As proposed, this scheme would provide biodiversity benefits to compensate for losses, by improving existing sites of biodiversity or creating new sites.



GREEN AND BLUE INFRASTRUCTURE

POLICY GB8 - ALLOTMENTS, AGRICULTURE AND LOCAL FOOD GROWING

Our approach

We will encourage the continued use of allotments and agricultural land, and promote new, innovative uses of green space for local food growing, including community farming, gardening and orchards, and commercial food production.

We will achieve this by

- (a) Retaining the existing allotments and resisting their loss unless in accordance with the borough's Allotment Strategy;
- (b) Protecting agricultural land;
- (c) Working with partners and local communities to identify sites with potential for local food growing and supporting projects that promote community gardening, farming and orchards; and
- (d) Supporting initiatives for commercial food production.

We will expect development proposals to

- e) Be consistent with and positively contribute to the open space and/or nature conservation designation of the land;
- (f) Retain allotments and the best and most versatile agricultural land, unless it can be demonstrated that they are no longer required or viable for such purposes. In the event that such land is no longer required, the feasibility of appropriate alternative open space uses which allow the site to maintain its value for growing food such as community gardens or orchards, should be considered first; and
- (g) Avoid adverse impacts on adjacent allotments or agricultural land.

We are taking this approach because

7.16 The use of green space for local food growing has many benefits, by promoting more active, healthy lifestyles, adding to local residents' connection with and sense of ownership of local green spaces and supporting wider sustainability benefits. Promoting agriculture and commercial food growing, and encouraging farmers to adopt environmental stewardship schemes, can also help improve the biodiversity value of urban fringe areas and the Green Belt.

GREEN AND BLUE INFRASTRUCTURE

POLICY GB8 - ALLOTMENTS, AGRICULTURE AND LOCAL FOOD GROWING

Supporting facts

Allotments, agriculture and local food growing in the borough

There are 32 allotment sites (in active use) managed by the council, which seeks to improve them to meet local demand. Recent improvements have seen water supplies added to existing sites to enable increased use. However it is acknowledged that poor infrastructure is an issue on some sites, and continued investment is required. There is currently a need to review local demand for allotments, and potential to expand existing and currently underused sites, if required. Capital Growth is a partnership project between London Food Link, the Mayor of London and the Big Lottery's Local Food Fund. Its goal was to create 2012 community food growing spaces across London by 2012, and to date has created 2182 spaces. It offers practical support and training to individuals and groups wanting to grow their own food. There are also a number of farms in the borough, largely located in the west, in the Green Belt, but there is also agriculture present further east, at Osterley and Syon Parks.

Notes

- The Mayor of London's Food Strategy provides more detail on local food production, and sets the following aims: to improve Londoner's health; reduce negative environmental impacts of London's food system; support a vibrant food economy; celebrate and promote London's food culture; and develop London's food security.



COMMUNITY INFRASTRUCTURE

POLICY CI3 - HEALTH FACILITIES AND HEALTHY PLACES

Our approach

We will facilitate development of a network of health facilities which caters for the increased population and the changing health needs of the borough, while making the borough an environment which encourages healthy living.

We will achieve this by

- (a) Supporting the delivery of new health facilities in areas of need, as identified by Hounslow Clinical Commissioning Group (CCG) or a subsequent commissioning body and through the Joint Strategic Needs Assessment (JSNA) or subsequent assessments. This will include:
 - i. The redevelopment of Heston Health Centre; and
 - ii. A primary care centre at the West Middlesex Hospital site;
- (b) Supporting the improvement and modernisation of existing health facilities through partnership working with the relevant health service providers. This will include improvements to Chiswick Health Centre; and
- (c) Promoting measures which will help to prevent the health issues identified in the Hounslow JSNA or subsequent assessments and make the borough a healthy place to live.

We will expect development proposals to

- (d) Contribute to the health and well-being of the local community where possible, using guidelines such as Active Design; and
- (e) Where required, use the outcomes of a Health Impact Assessment (HIA) to mitigate negative impacts and health risks arising from the scheme.

COMMUNITY INFRASTRUCTURE

POLICY CI3 - HEALTH FACILITIES AND HEALTHY PLACES

We are taking this approach because

8.11 An accessible network of high quality health facilities combined with other measures which promote well-being will help to create a healthy community in the borough. The population of the borough is increasing, putting additional and new pressures on to the health system. Action is needed to target the major health issues of this population which include obesity and ageing, as identified in the Hounslow Joint Strategic Needs Assessment 2012/13. The 'Better Care, Closer to Home: out of hospital strategy', which has been produced by Hounslow Clinical Commissioning Group (CCG), aims to deliver a greater number of services at home or in primary care rather than through hospitals. This will impact on the scale and nature of the physical infrastructure which is needed for health care in the future, with the emphasis being on 'prevention, early intervention and care at home'.

8.12 The council will work in partnership with the new structure of health providers, led by the newly established Public Health team which now sits within the local authority. New development will be required to consider its impacts on the health of the borough and also to contribute to the wider health and well-being of residents. Major developments are required to undertake Health Impact Assessments (HIA) by the London Plan Policy

8.13 Where a HIA is carried out the council will expect the scheme to address broader health and wellbeing impacts of the development through the mitigation of health related problems. This policy sets out the council's approach to improving health care. However other policies, including those in Chapter 10 covering walking and cycling routes and Chapter 6 covering accessible design, provide detail on measures which will improve health while having an alternative purpose.



COMMUNITY INFRASTRUCTURE

POLICY CI3 - HEALTH FACILITIES AND HEALTHY PLACES

Notes

- The estate strategy details are outlined in the 'Better Care, Close to Home: out of hospital strategy' February 2013.
- The health and well-being needs of the current population in the borough are outlined in the Joint Strategic Needs Assessment (JSNA) 2012/13.
- Sport England, in partnership with Public Health England, has produced Active Design guidance
- Further information relating to this policy can be found through the Public Health England 'Healthy People, Healthy Places' programme.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

Our approach

We will seek to maximise the supply of housing in the borough to meet housing need in a manner that is consistent with sustainable development principles and is built at a rate that will exceed the London Plan annualised completion targets to achieve at least 12,330 new homes between 2015 and 2030. We will seek new opportunities to augment this growth where new infrastructure investment creates opportunities for levels of growth hitherto found to be unsustainable.

We will achieve this by

- (a) Allocating sites of a range of different sizes and locations to ensure there is a resilient and flexible stock of opportunities for housing development that offers a choice of high quality homes;
- (b) Supporting proposals for new development and conversions on other sites, including small sites, in the context of the presumption in favour of sustainable development;
- (c) Encouraging the effective use of land by reusing previously developed land provided that it is not of high environmental value or in a use that is protected otherwise in the Local Plan;

(d) Investigating, collaborating and promoting new opportunities to augment housing delivery targets with sustainable development, including through the preparation of two partial plan reviews for the Great West Corridor and the west of the borough;

(e) Publishing information on the rate of housing completions and the trajectory of deliverable and developable housing supply against an annual monitoring target of 822 additional homes per year. In doing so we will regularly review the need for changes to the site allocations and policies impacting on housing supply as part of a housing implementation strategy;

(f) Recognising that an important contribution to housing supply will come from small infill sites throughout the borough, and requiring the design of these to respond to and reflect local context and character. In doing so we will monitor and manage the cumulative impact of development;

(g) Maintaining a presumption against the development of self-contained residential units within the curtilage of existing dwellings where the proposal would be in conflict with other policies in this plan;

(h) Working with developers to unlock blockages to development and seek to ensure necessary infrastructure is in place in a timely manner; and

(i) Re-considering development proposals in the context of the Local Plan where applications to renew unimplemented planning permissions come forward, and reviewing the need to review Local Plan site allocations in the later phases of the plan period in order to maintain a rolling supply of deliverable housing sites and infrastructure.

We will expect development proposals to

- (j) Have regard to the design standards of the development plan and have regard to related supplementary planning documents;
- (k) Be completed in balance with existing and planned infrastructure, and contribute to the provision of further infrastructure to achieve sustainable development and sustainable mixed communities;
- (l) Include clear information on the anticipated rate of completion of the proposed development, and to construct housing in the phasing anticipated; and
- (m) Provide a clear explanation of why development could not proceed in the case of applications to renew unimplemented planning permissions, and set out a programme of proposed works.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

We are taking this approach because

5.1 The 2011 Census found that the population of London was growing much faster and in different ways than was previously forecast. Similarly, the borough population has been growing faster, leading to increased levels of housing need and changes to the housing types required. The borough's projected population growth will result in continued demand for new housing in the borough through the lifetime of the Local Plan.

5.2 On the demand side, in accordance with national planning guidance, the council has considered the full extent of objectively assessed housing need in the borough; a range of alternative projections and forecasts are available but these are uncertain. The council considers the best available assessment of unconstrained need to be those derived from the 2014 London Strategic Housing Market Assessment. This indicates a need for (on average) 1350 additional dwellings per annum (dpa) over the period 2015-2030; with a higher rate of new household formation in the early part of the plan period and lower rate in the later part. The level of need will be reviewed regularly through borough housing market assessment taking account of the best available evidence of population and household change across the London housing market area and also more localised patterns.

5.3 On the supply side, the London SHLAA 2014 was designed to address the NPPF requirement to identify supply to meet future housing need as well as being 'consistent with the policies set out in this Framework' (NPPF paragraph 47), not least its central dictum that resultant development must be sustainable. The result is a minimum housing target constrained by the need for a planning balance to ensure sustainable development. The London Plan (March 2015) sets a housing supply target of 822dpa over the period 2015-2025.

5.4 The Local Plan provides for exceeding the annual housing supply target for the whole of the plan period 2015-30, and makes provision to augment this growth where new infrastructure investment creates opportunities for levels of growth hitherto found to be unsustainable. The Plan commits the council to investigate, collaborate and promote new opportunities to augment housing supply targets with sustainable development opportunities in town centres and any surplus industrial sites around existing transport nodes. However, the best opportunities are considered to be where new transport links and major policy change can transform development potential at the emerging Opportunity Area at the Great West Corridor and through a review of the west of the borough including the Heathrow Opportunity Area.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

5.5 This policy seeks to maximise the supply of additional housing in the borough in a manner that is consistent with sustainable development principles, and ensure it is built at a rate of that will meet the London Plan annual completion targets for the relevant period. The council will seek to ensure that during the period between 2015 and 2030, a minimum of 12,330 additional dwellings will be completed. The best available household projections indicate a level of housing need far in excess of the figure of 12,330 dwellings over the plan period. It can be seen from the table and figures below that the spatial focus of new development will shift through the phases of the Local Plan, first to the most accessible locations for regeneration and intensification, then moving on to new opportunities. The evidence base used to identify the capacity for new housing supply does include a contribution from small sites (criterion (b) refers) developed in a manner consistent with the policies of the plan and sustainable development principles. However, it does not require development of back gardens to achieve this.

5.6 Site allocations have been made for a range of types, sizes and spread of sites both to meet a step-change in annual housing delivery (from the previous 470 per year to 822 per year - an increase of 79%), and to ensure resilience to the potential blockages to delivery.

5.7 While in past years the new average annual monitoring target of at least 822 dwellings has been exceeded, to maintain this rate will require a step-change in new housing completions that will be challenging to maintain. This policy commits the council to work with stakeholders and the promoters of development to maintain this rate of new housing development.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

5.8 The increase in housing development will inevitably lead to new pressures on the environment and services, but planning decisions should continue to ensure sustainable development. All new development should conserve and enhance local heritage, respond to and reflect local context and character and comply with policy standards and guidelines. Planning decisions will ensure necessary transport, physical and social infrastructure, including additional school places, will be deliverable in a timely manner to meet the needs generated by new housing development and to support the continuing needs of existing residents and businesses in the borough, whilst avoiding serious harm to the historical and environmental assets and essential character of the borough. The council will monitor the impact of development, including the cumulative impact of small developments, and manage future development through the development management and plan making processes, and where necessary, protect the potential of allocated sites for necessary infrastructure uses (such as education) and make appropriate new site allocations.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

What this will look like

Table SC1.1: Distribution of housing growth, showing the sources and broad distribution of housing sites over the plan period

District	Number of residential units				
	Phase 1	Phase 2		Phase 3	
	2015-20	2020-25		2025-30	
	Large sites (allocated and existing permissions)	Allocated sites	Broad locations	Allocated sites	Broad locations
Bedfont	0	0	31	0	100
Brentford	1454	1237	184	0	228
Chiswick	360	0	296	0	395
Cranford and Heston	313	0	42	0	220
Feltham	63	22	113	22	423
Hanworth	21	0	37	0	97
Hounslow	1255	1243	95	267	98
Hounslow West	114	98	30	250	132
Isleworth	263	131	168	69	262
Osterley and Spring Grove	198	0	15	0	50
Total from large sites	4041	2731		608	
Total from broad locations	0		1011		2005
Total from small sites	1034	805		805	
Grand total by phase	5075	4547		3418	
Grand total 2015-2030	13,040				

- 'Allocated sites' are specific deliverable sites identified in the site allocations in this plan
- Potential developable sites for housing growth have been identified using the pan-London SHLAA (2014) methodology. At this stage these are identified at the scale of 'broad locations' where housing growth will be achieved.
- 'Small sites' are smaller than 0.25ha.
- The ten locations used in this table and the following diagrams are derived from the London Borough of Hounslow Urban Context and Character Study (2014) and do not correspond to electoral wards.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

What this will look like

Table SC1.1A: Further detail to identify the distribution of allocated housing sites and existing planning permissions comprising Phase 1

PHASE 1 DETAIL		
District	Phase 1 (2015-20)	
	Large sites	
	Allocated sites	Existing permissions
Bedfont	0	0
Brentford	1325	129
Chiswick	360	0
Cranford and Heston	276	37
Feltham	63	0
Hanworth	21	0
Hounslow	1148	107
Hounslow West	114	0
Isleworth	263	0
Osterley and Spring Grove	198	0
Total from large sites	3768	273
Total from broad locations	0	
Total from small sites	1034	
Grand total Phase 1	5075	

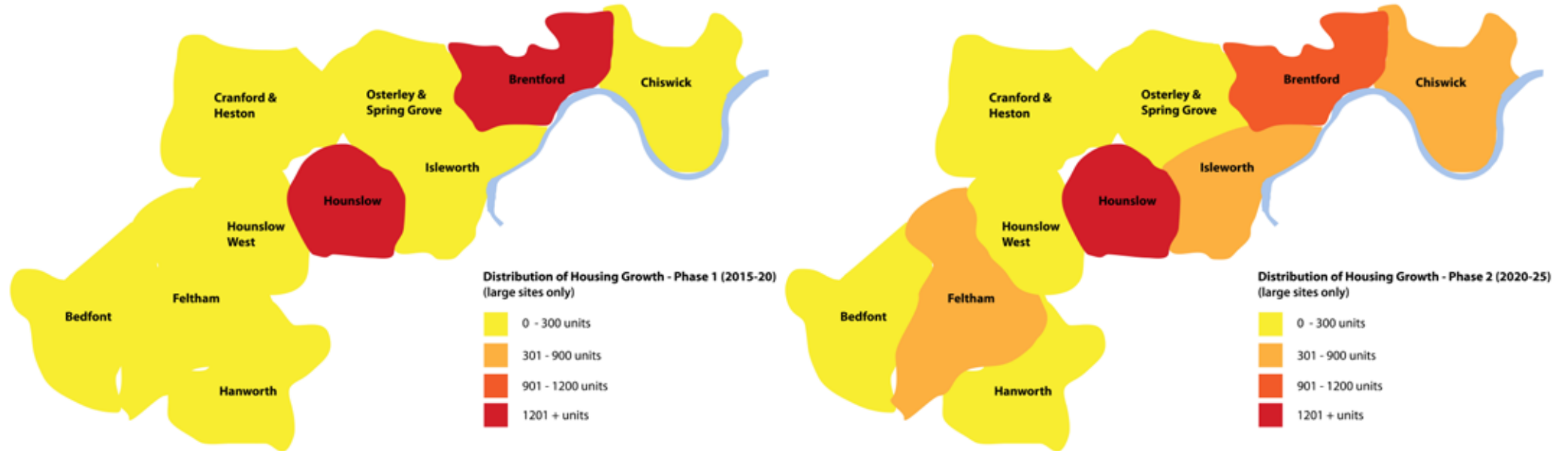


SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

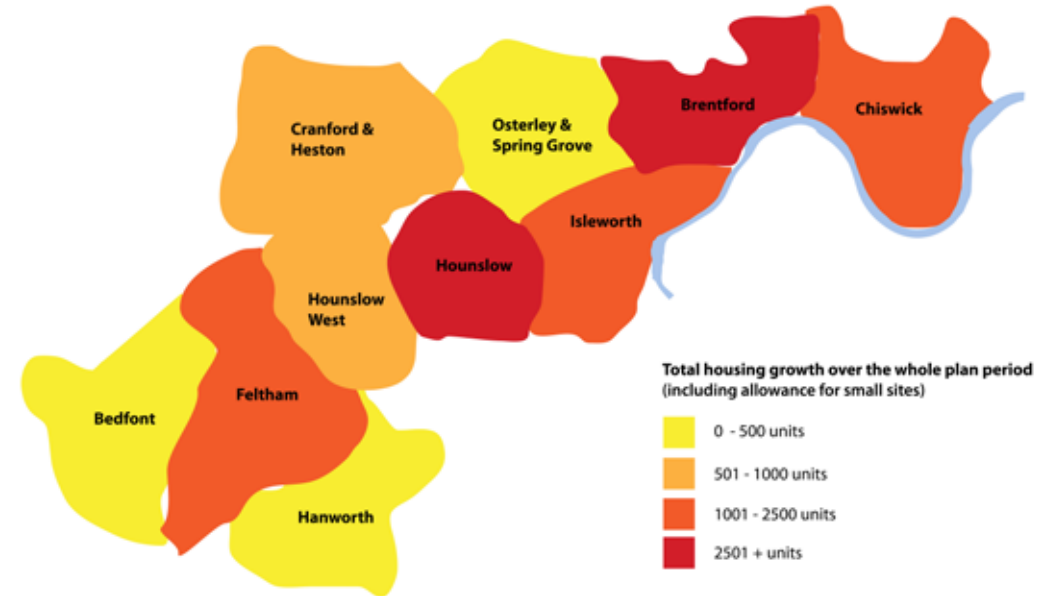
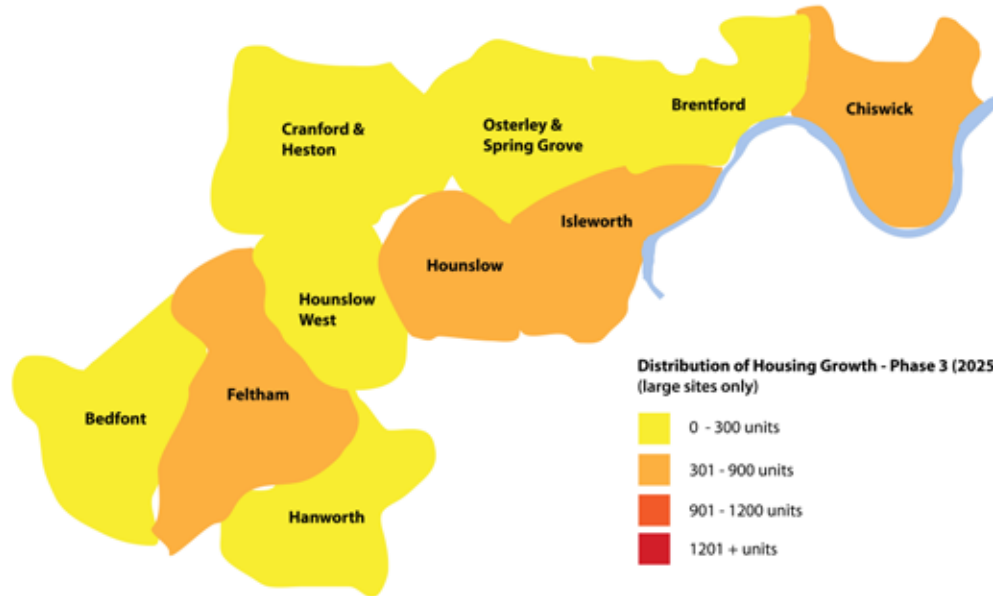
What this will look like

Figure SC 1.2: Spatial strategy for housing growth - diagrams showing the broad distribution of housing growth over the phases of the plan period



SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH



SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

Table SC1.3: Projected population growth in the borough across the ten districts

London Borough of Hounslow District	Data Index: 12 Round of Demographic Projections - SHLAA-based ward projections 2013-03-26 By LB Hounslow 'Local Plan 2015-30' Districts					
	Census 2011	Projected 2016	Projected 2025	Projected 2030	Increase 2011-30	As %
Bedfont	12,752	13,462	14,319	14,684	1,932	15.2
Brentford	14,404	16,842	19,361	19,981	5,577	38.7
Chiswick	34,490	36,701	39,478	40,727	6,237	18.1
Cranford and Heston	49,543	53,013	56,739	58,420	8,877	17.9
Feltham	27,209	28,785	32,415	33,679	6,470	23.8
Hanworth	23,652	25,805	28,537	29,611	5,959	25.2
Hounslow	26,680	29,300	32,863	34,490	7,810	29.3
Hounslow West	27,479	30,484	34,799	37,015	9,536	34.7
Isleworth	25,634	27,501	30,192	31,054	5,420	21.1
Osterley and Spring Grove	13,083	13,890	14,763	15,118	2,035	15.6
LB Hounslow	254,926	275,783	303,466	314,779	59,853	23.5

Supporting facts

- Total number of existing dwellings in the borough is estimated to be 97,000 (2011 Census).
- The number of households in the borough has been growing at an average of 1,100 each year over the last decade, increasing from 84,000 households in 2001 to 97,000 in 2011. The Census shows that the average household has increased in size from 2.54 in 2001 to 2.67 in 2011, indicating a rising birth rate and overcrowding because of a shortage of larger affordable family homes for families with dependent children, and a shortage of affordable small accommodation suitable for new households to form.

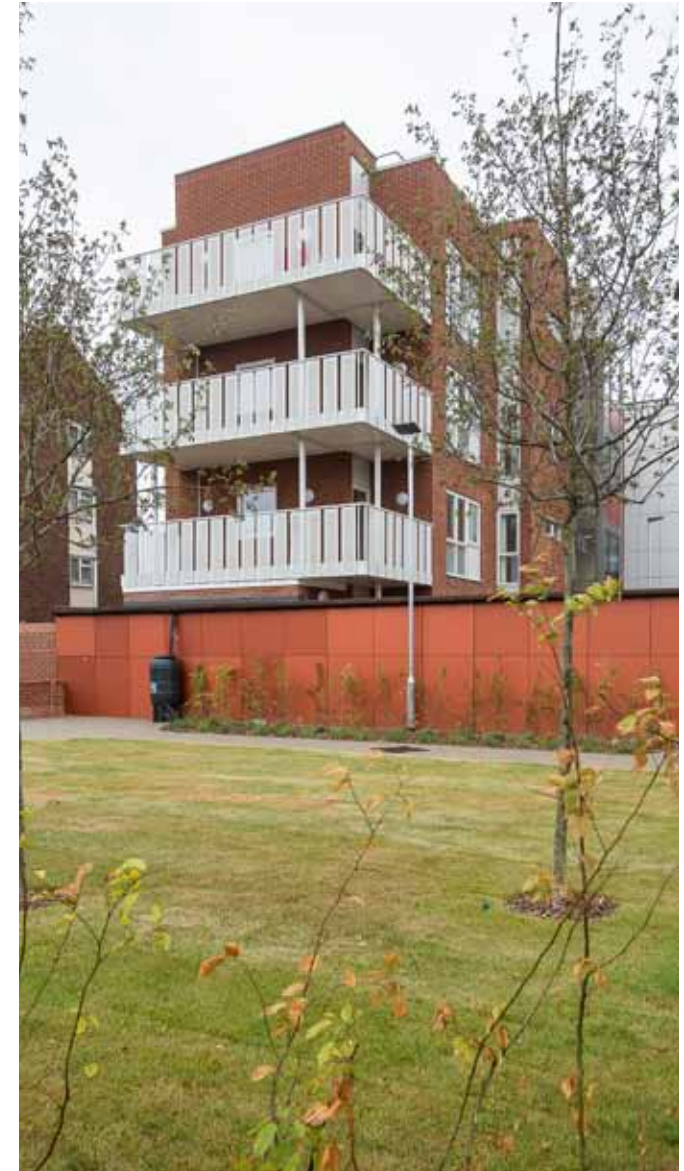
NB. These figures are indicative and derived from ward based projections

SUSTAINABLE MIXED COMMUNITIES

POLICY SC1 - HOUSING GROWTH

Notes

- The Local Plan should be in general conformity with the London Plan, including the borough level annual housing growth targets set in the London Plan. The London Plan (2011) set an annual completions target of 470 additional dwellings per year for the borough, broadly similar to the rates in previous plans. The previous Hounslow UDP adopted this rate. In response to the significant increase in new population projections based on the 2011 census, the London Plan (March 2015) sets new housing targets that seek as far as possible to meet rising housing need. This Local Plan seeks to meet an anticipated new annual target of 822 additional homes for the borough over the period 2015-25, and rolls this forward to 2030.
- The London SHMA and SHLAA (2014) provide evidence for the Further Alterations to the London Plan (January 2014); details are available on the GLA website.
- The National Planning Policy Framework requires the local planning authority to demonstrate a five-year supply of deliverable housing sites, and developable sites and broad locations for growth for years 6-10 and 11-15.
- The council will publish monitoring reports to annually monitor the expected rate of housing completions and the delivery of a five-year supply of housing land through a housing trajectory.
- The council will maintain a housing implementation strategy to seek to maintain delivery of a five-year supply of housing land.
- See Implementation Policies IMP1 and IMP2 for further guidance on implementation of all developments including on mixed use sites allocations, the provision of necessary infrastructure and development viability and Urban Context and Character Policies CC1, CC2 and CC4.
- See London Borough of Hounslow Urban Context and Character Study for a definition of the districts given in Figure SC1.2 and Table SC1.3.
- The curtilage of a dwelling is the land immediately surrounding it, including any closely associated buildings and structures, garden land and driveways.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC2 - MAXIMISING THE PROVISION OF AFFORDABLE HOUSING

Our approach

We will maximise the provision of affordable mixed tenure housing on development sites and from all other sources of supply. We have set a strategic target that 40% of additional housing delivered across the borough between 2015 and 2030 be affordable.

We will achieve this through:

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

We will expect development proposals to

- (e) Provide an open book financial viability assessment and any supporting evidence to demonstrate the maximum provision of on-site affordable housing is being proposed on sites with a capacity for 10 or more homes, with reference to the 40% strategic affordable housing target as well as the impacts of existing floorspace through VBC and reduced CIL liability. Developers may also be asked to facilitate an independent viability assessment by a third party where requested by the council;
- (f) Provide affordable housing on-site, unless the council considers that such provision is not practical or feasible, in which case off-site provision or appropriate cash in-lieu payments may be considered in exceptional circumstances;
- (g) Deliver a mix of 60% affordable/social rented and 40% intermediate tenures on all qualifying sites; and
- (h) Provide an appropriate mix of both housing size and tenure in accordance with housing need as set out in Policy SC3.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC2 - MAXIMISING THE PROVISION OF AFFORDABLE HOUSING

We are taking this approach because

5.9 The need for affordable housing in the borough significantly outstrips the capacity and supply. The council's Housing Needs Assessment (2009) identifies that approximately half of all households in the borough seeking to move cannot afford market housing, either to rent or buy (assuming 40% of income is spent on housing).

5.10 This policy seeks to maximise the provision of affordable housing on all sites. However the council is aware that the on-site provision of affordable housing will be limited by overall development viability and other policy objectives. The council's CIL and Local Plan viability study evidence demonstrate that in most cases schemes can accommodate an affordable housing requirement between 10% and 40% (without grant funding), and between 30% and 40% in higher value areas. A strategic borough-wide affordable housing target of 40% of new homes from all sources (including new build, council housing building programme, bringing empty homes back in to use, purchase of street properties and government initiatives such as

Low Cost Home Ownership) has been set by the council over the lifetime of the plan. In addition, evidence prepared in the preparation of the Local Plan has demonstrated that the application of the Vacant Building Credit will have significant impact on the quantum of affordable housing delivered as the majority of allocated development sites contain existing floorspace. Consequently, the council's approach will be to seek the maximum viable amount the eligible floorspace a scheme can deliver, which may be significantly above the strategic target of 40% affordable housing.

5.11 In terms of the tenure of affordable housing provision, the Local Plan proposes a strategic split of 60% affordable/social rented and 40% intermediate housing in recognition of the role intermediate housing can play in freeing-up social rented housing and helping Londoners get a first step onto and move up the housing ladder. This 60/40 strategic split will be applied in the borough as a starting point for negotiation. It is acknowledged that deliverability will vary on a scheme-by-scheme basis depending on available funding sources and circumstances that will be demonstrated in the financial viability assessment.

5.12 To take account of changes in market conditions in accordance with paragraphs 50 and 205 of the NPPF, the council will require a further financial viability assessment of a scheme upon partial or full completion based upon the actual finances of the scheme nearer to completion for schemes presently anticipated to deliver low levels of affordable housing. Further information will be made available in an Affordable Housing Supplementary Planning Document.

5.13 The Local Plan does not specifically allocate sites exclusively for groups of people wishing to build their own homes or other specialist affordable housing needs, however supporting information submitted with such proposals will be positively considered. A proportion of all development should be designed to be readily adaptable to wheelchair users.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC2 - MAXIMISING THE PROVISION OF AFFORDABLE HOUSING

Notes

- The London Plan Policy requires boroughs to negotiate the maximum reasonable amount of affordable housing on individual schemes to contribute to meeting housing need, and to achieve mixed and balanced communities with housing choice. Policy 3.13 requires affordable housing provision on all sites with capacity to provide 10 or more homes, applying the density guidance set out in Policy 3.4 of that Plan. This also provides for boroughs to seek a lower threshold where justified.
- The London Plan Policies 3.10, 3.11 and 3.12 define affordable housing; address the setting of affordable housing targets and the negotiation of provision on a site by site basis.
- The council will publish monitoring reports to annually monitor the delivery of market and affordable housing.
- The Community Infrastructure Levy and Local Plan Policies Viability Study (2014) demonstrate that the housing policy together with the other requirements of CIL and the whole of the Local Plan is financially viable. Affordable housing funding over the plan period is unknown but based on past funding, past performance and current evidence, a 40% target is considered reasonable.
- The Hounslow Housing Strategy (2013) and Hounslow SHMA (2009 and 2014 update) address evidence of housing need in the borough and the council's strategy.
- The London Housing Strategy (2014) and Further Alterations to the London Plan (2014) update the policies and mechanisms necessary to step up the delivery of housing across London.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC3 - MEETING THE NEED FOR A MIX OF HOUSING SIZE AND TYPE

Our approach

We will seek to meet local housing need by securing a mix of new housing type, size and tenure across the borough.

We will achieve this by

- (a) Seeking a mix of new housing to meet objectively assessed and evidenced local need, based on the latest and/or most specific available evidence, and applying the general housing need mix requirements summarised in Figure SC3.1;
- (b) Negotiating the housing mix requirements using the mix summarised in Figure SC 3.1 as the starting point for the consideration of all housing proposals, whether achieved through change of use, conversion or new development;
- (c) Using this mix as the basis of monitoring new development across the borough and in local areas, and possibly adjusting site mix requirements in the light of the results of this evidenced monitoring;
- (d) Promoting and supporting appropriate specialist housing to meet specific affordable housing needs, including sites for groups of people wishing to build their own home; and

(e) Recognising that new housing development completed each year is a relatively small part of the total housing stock in the borough, which will be adapted to meet housing needs with and without the need for express planning permission. Trends in the subdivision and change to the existing housing stock will be monitored, and aspects of these changes will be managed where necessary to help best meet housing need.

We will expect development proposals to

- (f) Provide a mix of new housing as summarised in the Figure SC 3.1, unless otherwise agreed with the council on the basis of evidence;
- (g) Include a schedule of housing accommodation size and tenure; and
- (h) Provide a unit of family accommodation at ground floor or with direct access to the external amenity space where sub-division of large family houses (>130sqm 'original' floor area) is proposed.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC3 - MEETING THE NEED FOR A MIX OF HOUSING SIZE AND TYPE

We are taking this approach because

5.14 An important part of understanding the need and demand for housing for the borough's population is to ensure that new housing is of an appropriate size and type, and that the existing stock is managed appropriately too. To this end the council undertakes objectively assessed housing needs assessments and monitors new building and changes to the existing housing stock, with this work being reported through the latest Hounslow Borough Housing Market Assessment and Annual Monitoring Reports.

5.15 The latest Borough Housing Market Assessment has provided the source of mix included in Table SC3.1 below. This will be reviewed to take account of the latest Strategic Housing Market Assessment produced by the GLA for the London housing market area together with Borough Housing Market Assessment and the latest available projections and analysis. The requirements the council seeks will be based on the best available objective assessment of demand need, including careful consideration of the specific needs of different groups of occupiers, such as older people, families with children and single people. The council will also take account of evidence of specialist housing need submitted with any proposal, as well as any special characteristics of the site and the results of borough-wide and local area monitoring of recently completed development.

Table SC 3.1: General housing need mix requirements

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

(until superseded by new evidence published by the council)



SUSTAINABLE MIXED COMMUNITIES

POLICY SC3 - MEETING THE NEED FOR A MIX OF HOUSING SIZE AND TYPE

Supporting facts

- The total number of dwellings in the borough is currently estimated to be 97,000 (2011 Census).
- Of these, 18% have one bedroom, 32% have two bedrooms, 35% have three bedrooms and 10% have four bedrooms
- Of those dwellings completed in the last eight years, 32% have one bedroom, 46% have two bedrooms and 16% have three bedrooms.
- Further information on housing need is available from the Strategic Housing Market Assessment produced by the GLA and the borough Housing Market Assessments. These will be regularly reviewed.

Notes

- For the purposes of the Local Plan, a unit of family accommodation is defined as that providing two bedrooms and four bed spaces or more.
- London Plan Policy 3.8 addresses the need for housing choice.
- The National Planning Policy Framework (paragraph 159) requires that local planning authorities have a clear understanding of housing needs in their area, and that they should produce a Strategic Housing Market Assessment (SHMA) to identify the scale and mix of housing and range of tenures that is likely to be needed over the period of the plan. This should meet household and population projections taking account of migration and demographic change, address all types of

housing need including those of different groups in the community, families with children, older people, people with disabilities, service families and people wishing to build their own home.

- The GLA Strategic Housing Market Assessment (2014) and the Borough Housing Market Assessment (2009), and subsequent Reviews, provide evidence on the form of housing need.
- Policy SC5 addresses the need for a proportion of homes to be designed to be readily adaptable to wheelchair users.
- Policy SC6 seeks to manage the sub-division of large family houses to include at least one family unit, or in appropriate locations, to provide a large HMO (Policy SC10 refers).
- Policy SC8 addresses specialist housing needs including those of older people.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC4 - SCALE AND DENSITY OF NEW HOUSING DEVELOPMENT

Our approach

We will ensure the scale and density of new housing development balances the need to make efficient use of land and achieves high quality design and accessibility, whilst responding to and reflecting local context and character and protecting existing residents' amenity. Large-scale developments will be required to include a mix of land uses and spaces to help create a sense of place and community neighbourhood.

We will achieve this by

- (a) Optimising housing output, taking into account the policies for context and character, the design standards in the Local Plan and public transport accessibility on a case-by-case basis;
- (b) Applying the design standards contained within this Local Plan to ensure the delivery of high quality developments which will not compromise the amenity of existing and future residents; and
- (c) Having regard to the density ranges contained within the London Plan Policy 3.4 to help guide the design and scale of new housing developments. Notwithstanding this consideration, where opportunities to maximise housing densities at suitable larger sites in areas of good public transport accessibility exist or can be created, they should be explored where all other planning policies can be fully satisfied to achieve sustainable development.

We will expect development proposal to

- (d) Meet the design standards set out in Building Regulations and the Local Plan and expanded upon within detailed supplementary guidance documents, including but not limited to, demonstrating compliance with prevailing daylighting standards (BRE Guidance 2011) and habitable room window separation guidance; and
- (e) Respond to the Urban Context and Character Study, Conservation Area Appraisals, planning briefs, Neighbourhood Plan and other guidance prepared.

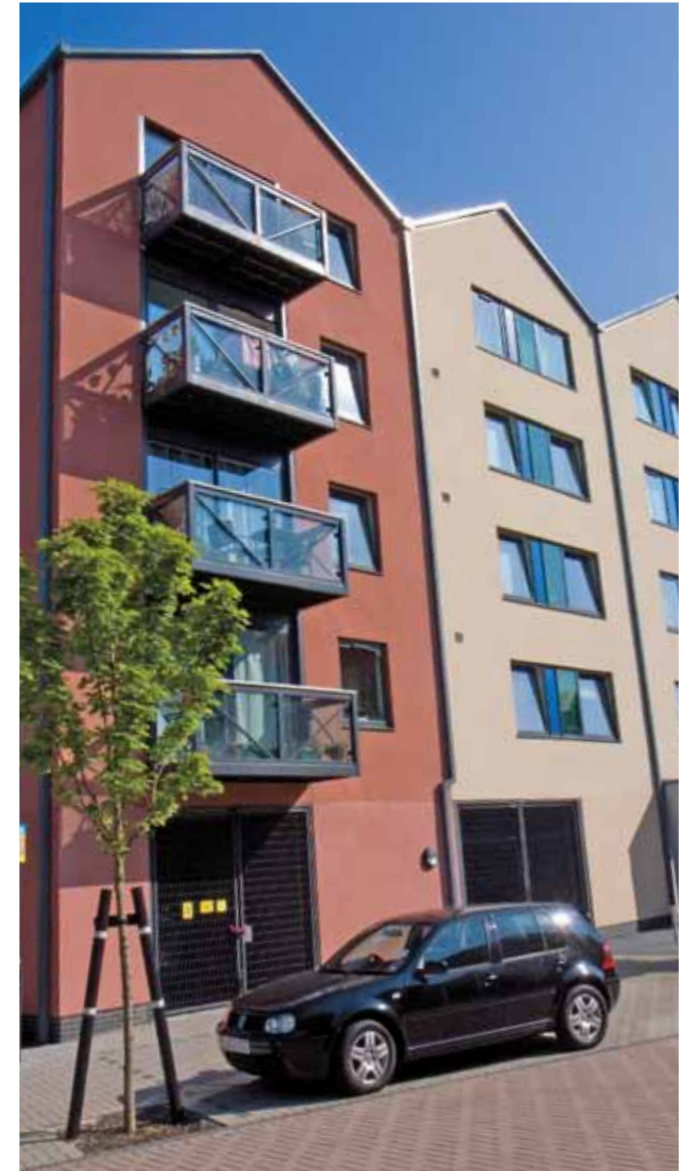
SUSTAINABLE MIXED COMMUNITIES

POLICY SC4 - SCALE AND DENSITY OF NEW HOUSING DEVELOPMENT

We are taking this approach because

5.16 The London Plan provides a strategic scale broad-brush matrix of possible housing density in different types of location and accessibility, as measured by Public Transport Accessibility Level (PTAL). While this approach is a useful guide at a pan-London scale, the council will expect all proposals to adopt a more sophisticated approach that is responsive to the context and character of the site and its setting, and the assessment of the real multi-modal transport accessibility (including the impact of committed improvements) to proposal sites. The Urban Character and Context Study reveals the complexity of identified urban types compared to the broad brush London Plan Density Matrix.

5.17 The housing growth enabled through the Plan reflects the aims of improving the quality and design of housing, application of the density matrix and sustainable development principles. Development proposals should not compromise the amenity of existing and future residents or the important characters of the area, including the amenity and character of back garden spaces. Proposals will be considered in the context of planning policies, supplementary guidance and evidence including the Urban Context and Character Study. Assessed against these policies, proposals for inappropriate garden land development will be rejected.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC4 - SCALE AND DENSITY OF NEW HOUSING DEVELOPMENT

Notes

- The council has published a borough-wide Urban Context and Character Study, which describes significant defining characteristics of development types and local geographic areas, offering design recommendations. The study is available on the council's website and is supported by Policy CC1.
- The London Plan Policy 3.5 and supplementary housing guidance address the quality and design of housing development, including space standards.
- The London Plan (March 2015) Policies 3.4 and 3.7 define 'large sites' where higher densities served by good public transport as appropriate to be of 5ha and accommodating more than 500 dwellings.
- The council will update the supplementary guidance on residential extensions and design.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC5 - ENSURING SUITABLE INTERNAL AND EXTERNAL SPACE

Our approach

We will ensure new housing development contributes to improving the quality and design of housing in the borough. Developments will be required to be of the highest quality internally and externally, and meet the demands of everyday life for the intended occupants, whilst offering flexibility to meet changing needs and respect the principles of good neighbourliness.

We will achieve this by

- (a) Applying the minimum internal space standards for all new housing developments and residential conversions, as set out in the Nationally Described Space Standard;
- (b) Seeking that provision of private external space that is usable and affords privacy and security with regard to the benchmark external space standards set out in Figure SC5.2; and
- (c) Ensuring the delivery of a minimum 10% of new dwellings provide enhanced accessibility or adaptability where the local authority is responsible for allocating or nominating a person to live in that dwelling.

We will expect development proposals to

- (d) Demonstrate compliance with the Nationally Described Space Standard with a flexible approach taken to residential conversions to achieve heritage conservation objectives;
- (e) Demonstrate through a clear design rationale how the benchmark external space standards contained in Figure SC5.2 have been considered. The exact area and character of external amenity space will vary according to the size and use of the dwelling unit;
- (f) Show how the aspect, usability, sense of enclosure and prevailing pattern established by local character have been considered in external open space proposals to create sufficiently high quality living conditions. The arrangement of external amenity space across a site should also be carefully considered to ensure an appropriate balance of public, communal and private space. In family sized units, there should be direct and easy access to a good sized private garden;

- (g) Be in accordance with the London Plan where flatted developments are proposed. This requires the provision of a minimum 5sqm of private outdoor space for all 1 to 2 person dwellings, with an additional 1sqm for each additional occupant. Balconies should be designed as an integral part of the building's elevation to maximise a beneficial aspect, and avoid positions that result in unacceptable overlooking and loss of privacy to other units or existing nearby dwellings; and
- (h) Contribute to the achievement of other objectives in the Local Plan where development proposals compromise the delivery of elements of this policy.

SUSTAINABLE MIXED COMMUNITIES

POLICY SC5 - ENSURING SUITABLE INTERNAL AND EXTERNAL SPACE

We are taking this approach because

5.18 New housing should provide the highest quality of internal and external space to meet the demands of everyday life for the occupants, including adequate space for people, moving around, their belongings and furnishings, and a range of activities. This requires a suitable quantity and quality of space for members of the household, of different ages and mobility, both to be together and to have a degree of privacy and space for activities such as home study and occasional home working when needed. In addition, a suitable quantity and quality of external amenity space, appropriate for relaxation as well as essential activities (such as waste recycling, drying space and storage), is also needed.

5.19 The standards and guidance for internal space are set out in the London Plan and associated Supplementary Planning Guidance and based on research and evidence supporting the London Plan and prepared in line with the former Lifetime Homes Standards, Housing Quality Indicators and other evidence. The external space standards adopted in the borough reflect the more open outer-suburban character of the borough compared to the more general pan-London standards of the London Plan. This additional outdoor space is an essential characteristic of suburbia and the borough and the reason why people wish to live in the borough. This character should be maintained so that residents choose to stay. The standards applied reflect the well-established standards of the Hounslow UDP and Supplementary Planning Guidance for houses with updates drawing on the London Plan to address the requirements for open space within flatted developments and conversions.



SUSTAINABLE MIXED COMMUNITIES

POLICY SC5 - ENSURING SUITABLE INTERNAL AND EXTERNAL SPACE

Figure SC 5.2: Benchmark external space standards

Houses

For houses the usable amenity space should be provided to no less than the following standards:

3 habitable rooms	50sqm
4 habitable rooms	60sqm
5 habitable rooms and over	75sqm

In addition to size the layout of the amenity space must always provide a suitable shape, aspect and siting. Extensions or on-site car parking should not result in undue loss of garden space.

Flats and other forms of residential development including conversions

Other forms of development should provide a combination of private outdoor space for every flat and communal open space.

A minimum of 5sqm of private outdoor space should be provided for each 1-2 person dwelling and an extra 1sqm should be provided for each additional occupant of that dwelling. This can be provided in the form of usable balconies, roof terraces or private garden space.

Communal external space should be provided at no less than the following standards:

For each flat

Up to 3 habitable rooms	25sqm
4 habitable rooms	30sqm
5 habitable rooms	40sqm

Less a reduction for the area of private space provided for each flat.

There should be a safe and convenient pedestrian access from every dwelling to communal space(s) of good and usable aspect and quality. These should be well landscaped and maintained, protect privacy and personal security and not be readily overlooked or accessible by non-residents. Extensions or on-site car parking should not result in undue loss of usable garden space.

In the case of flats and building conversions the quantitative space requirements will be applied with regard to exceptional design considerations.

Notes

- The internal housing space and wheelchair and other adaptability and accessibility standards required of new housing development should comply with the 'Technical Space Standards Nationally Described Space Standard' and Housing Optional Technical Standards and any superseding standards, where specified by the London Plan. (This refers to the optional Building Regulation requirements M4(2) and /or M4(3) as appropriate.) These standards consolidate and supersede the previous Lifetime Homes and other guidance and standards.
- Policy CC2 addresses design quality.
- London Plan Housing Policies and the Housing SPG provide further detailed requirements and standards.
- These standards draw on research and standards provided through: Lifetime Homes Guidance, Building for Life, HCA Housing Quality Indicator Standards, RIBA Case for Space and other good practice. Also, the Hounslow UDP standards that have been consistently supported in planning appeal decisions.
- The council will update the supplementary guidance on residential extensions and design.

- 3.2.6 In order to support the Healthy Streets Approach, development proposals should take account of the existing and planned **connectivity of a site via public transport and active modes** to town centres, social infrastructure and other services and places of employment. Opportunities to improve these connections to support higher density development should be identified.

Policy D3 Optimising site capacity through the design-led approach

The design-led approach

- A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in [Policy D2 Infrastructure requirements for sustainable densities](#)), and that best delivers the requirements set out in Part D.
- B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with [Policy D2 Infrastructure requirements for sustainable densities](#). Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.
- C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of [Policy H2 Small sites](#).
- D Development proposals should:

Form and layout

- 1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions

- 2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
- 3) be street-based with clearly defined public and private environments
- 4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience

- 5) achieve safe, secure and inclusive environments
- 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 7) deliver appropriate outlook, privacy and amenity
- 8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- 9) help prevent or mitigate the impacts of noise and poor air quality
- 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character

- 11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
- 12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
- 13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy

14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

E Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

- 3.3.1 For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land by optimising site capacity. This means ensuring the development's form is the most appropriate for the site and land uses meet identified needs. The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.
- 3.3.2 **A design-led approach** to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.
- 3.3.3 The **area assessment** required by Part A of Policy D1 London's form, character and capacity for growth, coupled with an area's assessed capacity for growth as required by Part B of Policy D1 London's form, character and capacity for growth, will assist in understanding a site's context and determining what form of development is most appropriate for a site. Design options for the site should be assessed to ensure the proposed development best delivers the design outcomes in Part B of this policy.
- 3.3.4 Designating appropriate development capacities through site allocations enables boroughs to proactively optimise the capacity of strategic sites through a consultative design-led approach that allows for **meaningful engagement and collaboration** with local communities, organisations and businesses.
- 3.3.5 Developers should have regard to designated development capacities in allocated sites and ensure that the design-led approach to optimising capacity on unallocated sites is carefully applied when **formulating bids** for development sites. The sum paid for a development site is not a relevant consideration in determining acceptable densities and any overpayments cannot be recouped through compromised design or reduced planning obligations.
- 3.3.6 **Good design** and good planning are intrinsically linked. The form and character of London's buildings and spaces must be appropriate for their location, fit for purpose, respond to changing needs of Londoners, be inclusive, and make

Policy D4 Delivering good design

Design analysis and development certainty

- A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of [Policy D3 Optimising site capacity through the design-led approach](#).
- B Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

- C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.
- D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:
 - 1) include a residential component that exceeds 350 units per hectare; or
 - 2) propose a building defined as a tall building by the borough (see [Policy D9 Tall buildings](#)), or that is more than 30m in height where there is no local definition of a tall building.

- E The format of design reviews for any development should be agreed with the borough and comply with the Mayor’s guidance on review principles, process and management, ensuring that:
- 1) design reviews are carried out transparently by independent experts in relevant disciplines
 - 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme
 - 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews
 - 4) design review recommendations are appropriately recorded and communicated to officers and decision makers
 - 5) schemes show how they have considered and addressed the design review recommendations
 - 6) planning decisions demonstrate how design review has been addressed.

Maintaining design quality

- F The design quality of development should be retained through to completion by:
- 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development
 - 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
 - 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter
 - 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

Policy D6 Housing quality and standards

- A Housing development should be of high quality design and provide adequately-sized rooms (see [Table 3.1](#)) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- B Qualitative aspects of a development are key to ensuring successful sustainable housing. [Table 3.2](#) sets out key qualitative aspects which should be addressed in the design of housing developments.
- C Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in [Policy D3 Optimising site capacity through the design-led approach](#) than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- D The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- E Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.
- F Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space

- 1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in [Table 3.1](#).
- 2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.

- 3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.
- 4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..
- 5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).
- 6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.
- 7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.
- 8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

Private outside space

- 9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in [Table 3.1](#)
- G The Mayor will produce guidance on the implementation of this policy for all housing tenures.

Policy D7 Accessible housing

- A To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:
- 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’
 - 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

- 3.7.1 Many households in London require **accessible or adapted housing** to lead dignified and independent lives. In addition, Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation. To address these and future needs, Policy D7 Accessible housing should apply to all dwellings which are created via works to which Part M volume 1 of the Building Regulations applies,³⁰ which, at the time of publication of this Plan, generally limits the application of this policy to new build dwellings.
- 3.7.2 Where any part of an **approach route** – including the vertical circulation in the common parts of a block of flats – is shared between dwellings of different categories (i.e. M4(2) and M4(3)), the design provisions of the highest numbered category of dwelling served should be applied, to ensure that people can visit their neighbours with ease and are not limited by the design of communal areas. For residential disabled persons parking requirements – see Policy T6 .1 Residential parking.
- 3.7.3 To ensure that all potential residents have **choice within a development**, the requirement for M4(3) wheelchair user dwellings applies to all tenures. Wheelchair user dwellings should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes.

³⁰ This is governed by the Building Regulations 2010: http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi_20102214_en.pdf and the Building Regulations &c. (Amendment) Regulations 2015: http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi_20150767_en.pdf

provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

- 3.11.4 By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. Consideration should be given to **physical, personnel and electronic security** (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Policy D12 Fire safety

- A In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:
- 1) identify suitably positioned unobstructed outside space:
 - a) for fire appliances to be positioned on
 - b) appropriate for use as an evacuation assembly point
 - 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
 - 3) are constructed in an appropriate way to minimise the risk of fire spread
 - 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
 - 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

B All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturers' details
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

- 3.12.1 The **fire safety of developments** should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety. How a building will function in terms of fire, emergency evacuation, and the safety of all users should be considered at the earliest possible stage to ensure the most successful outcomes are achieved, creating developments that are safe and that Londoners can have confidence living in and using.
- 3.12.2 The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve the

- 3.13.9 Some **permitted development**, including change of use from office to residential, requires noise impacts to be taken into consideration by the Local Planning Authority as part of the prior approval process. Boroughs must take account of national planning policy and guidance on noise, and therefore the Agent of Change principle would apply to these applications.
- 3.13.10 **Noise and other impact assessments** accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the particular characteristics of existing uses can be properly captured and assessed. For example, some businesses and activities can have peaks of noise at different times of the day and night and on different days of the week, and boroughs should require a noise impact assessment to take this into consideration. Boroughs should pay close attention to the assumptions made and methods used in impact assessments to ensure a full and accurate assessment.
- 3.13.11 Reference should be made to [Policy D14 Noise](#) which considers the impacts of noise-generating activities on a wider scale and [Policy SI 1 Improving air quality](#) which considers the impacts of existing air pollution. **Further guidance** on managing and mitigating noise in development is also provided in the Mayor's London Environment Strategy.

Policy D14 Noise

- A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
- 1) avoiding significant adverse noise impacts on health and quality of life
 - 2) reflecting the Agent of Change principle as set out in [Policy D13 Agent of Change](#)
 - 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
 - 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)

- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation
- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

B Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra’s Noise Action Plan for Agglomerations.

- 3.14.1 The **management of noise** is about encouraging the right acoustic environment, both internal and external, in the right place at the right time. This is important to promote good health and a good quality of life within the wider context of achieving sustainable development. The management of noise should be an integral part of development proposals and considered as early as possible. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes. This can mean allowing some places or certain times to become noisier within reason, whilst others become quieter. Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise-sensitive wildlife species, or parks and green spaces affected by traffic noise and pollution. Boroughs, developers, businesses and other stakeholders should work collaboratively to identify the existing noise climate and other noise issues to ensure effective management and mitigation measures are achieved in new development proposals.
- 3.14.2 The **Agent of Change Principle** places the responsibility for mitigating impacts from existing noise-generating activities or uses on the new development. Through the application of this principle existing land uses should not be unduly affected by the introduction of new noise-sensitive uses. Regard should be given to noise-generating uses to avoid prejudicing their potential for intensification or expansion.

Policy H1 Increasing housing supply

- A Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.
- B To ensure that ten-year housing targets are achieved, boroughs should:
- 1) prepare delivery-focused Development Plans which:
 - a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification
 - b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2
 - c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.
 - 2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:
 - a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station³⁹ or town centre boundary⁴⁰
 - b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets
 - c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses
 - d) the redevelopment of surplus utilities and public sector owned sites
 - e) small sites (see Policy H2 Small sites)
 - f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support

³⁹ Tube, rail, DLR and tram stations

⁴⁰ District, major, metropolitan and international town centres – for the purposes of Policy H1 Increasing housing supply Part B2a, the 800m distance is measured from the edge of the town centre boundary

London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.

- 3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

- C Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.
- D Boroughs should publish and annually update housing trajectories based on the targets in [Table 4.1](#) and should work with the Mayor to resolve any anticipated shortfalls.
- E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.
- F On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.

- 4.1.1 The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified **need for 66,000 additional homes per year**. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons' accommodation within the overall figure.
- 4.1.2 For the purposes of the Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The advantage of **strategic planning** is that it allows London to focus development in the most sustainable locations, allowing all of London's land use needs to be planned for with an understanding of how best to deliver them across the capital. Because of London's ability to plan strategically, boroughs are not required to carry out

widespread, where it does happen it reduces the amount of new housing stock being occupied by households in need. Where the practice is widespread in a new building it can also negatively affect the provision of services to tenants.

- 4.9.3 It is unlawful for homes in greater London to be used **as short-term holiday rented accommodation** for a cumulative period of more than 90 days a year without seeking planning permission.⁶⁵ The use of dwellings as short-term holiday rentals can have a detrimental impact on neighbours' residential amenity and community cohesion in the wider area where concentrated in a particular location. The use also reduces the supply of homes available for people to live in.
- 4.9.4 **Houses in multiple occupation (HMOs)** are an important part of London's housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, give rise to concern. Where they are of a reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs.

Policy H10 Housing size mix

- A Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
- 1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
 - 2) the requirement to deliver mixed and inclusive neighbourhoods
 - 3) the need to deliver a range of unit types at different price points across London
 - 4) the mix of uses in the scheme
 - 5) the range of tenures in the scheme

⁶⁵ Pursuant to the Deregulation Act 2015 (sections 44 and 45: Short-term use of London accommodation: relaxation of restrictions and power to relax restrictions.): http://www.legislation.gov.uk/ukpga/2015/20/pdfs/ukpga_20150020_en.pdf

- 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
- 7) the aim to optimise housing potential on sites
- 8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock
- 9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

B For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:

- 1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households
- 2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation
- 3) the impact of welfare reform
- 4) the cost of delivering larger units and the availability of grant.

4.10.1 The 2017 London Strategic Housing Market Assessment (SHMA) estimated the **unit size mix of new homes** required to meet London's current and projected housing needs using three different scenarios, the results of which are set out in the SHMA report addendum. The main factors influencing this size mix include the projected growth in different household types, assumptions about under-occupation, and the substantial number of overcrowded households in London, whose needs can be addressed by providing family-sized homes but also smaller homes for concealed households to move into. Boroughs can draw on the scenarios in the SHMA to understand housing mix requirements or to inform local assessments. While the SHMA identifies the full range of needs between 2016 and 2041, boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units of particular sizes.

4.10.2 Policy H10 Housing size mix sets out all the issues that applicants and boroughs should take into account when considering the **mix of homes on a**

Policy H11 Build to Rent

- A Where a development meets the criteria set out in Part B, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity.
- B To qualify as a Build to Rent scheme the following criteria must be met:
- 1) the development, or block or phase within the development, has at least 50 units⁶⁶
 - 2) the homes are held as Build to Rent under a covenant for at least 15 years⁶⁷
 - 3) a clawback mechanism is in place that ensures there is no financial incentive to break the covenant
 - 4) all the units are self-contained and let separately
 - 5) there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme
 - 6) longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months
 - 7) the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked
 - 8) there is on-site management. This does not necessarily mean full-time dedicated on-site staff, but that all schemes need to have systems for prompt resolution of issues and some daily on-site presence
 - 9) providers have a complaints procedure in place and are a member of a recognised ombudsman scheme

⁶⁶ Boroughs may set their own thresholds to reflect local housing market circumstances and affordable housing need. However, it is important that where a lower threshold is set, Build to Rent schemes must still operate according to the stipulations in this guidance in order to qualify for the application of the Built to Rent policy.

⁶⁷ Covenant periods are expected to increase as the market matures.

10) providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

- C To follow the Fast Track Route, Build to Rent schemes must deliver at least 35 per cent affordable housing, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with [Policy E7 Industrial intensification, co-location and substitution](#). The Mayor expects at least 30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents.⁶⁸ Schemes must also meet all other requirements of Part C of [Policy H5 Threshold approach to applications](#).
- D Where the requirements of C above are not met, schemes must follow the Viability Tested Route set out in [Policy H5 Threshold approach to applications](#). Viability assessments on such schemes should take account of the differences between Build to Rent and Build for Sale development and be undertaken in line with the Affordable Housing and Viability SPG.
- E On schemes that propose a proportion of homes as Build to Rent and a proportion for sale to the market, Part A of this policy will only be suitable for the Build to Rent element. The scheme should be assessed as a whole, with affordable housing calculated as a proportion of total habitable rooms across the scheme.

⁶⁸ Boroughs may publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level.

Policy S1 Developing London's social infrastructure

- A When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.
- B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans.
- C Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
- D Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.
- E New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.
- F Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where:
 - 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or;
 - 2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.
- G Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (see Part F2).

Policy S2 Health and social care facilities

- A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:
- 1) identify and address local health and social care needs within Development Plans, taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
 - 2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes
 - 3) undertake a needs assessment to inform Development Plans, including an audit of existing health and social care facilities. Needs should be assessed locally and sub-regionally, addressing borough and CCG cross-boundary issues
 - 4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision and to address needs across borough boundaries
 - 5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.
- B Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.
- C New facilities should be easily accessible by public transport, cycling and walking.

5.2.1 London's health care services are vital to maintaining and improving Londoners' quality of life. The health service is also one of the capital's major employers, with over 200,000⁸² people working in the NHS in London. Several factors

⁸² NHS Workforce Statistics, NHS, April 2018 <https://digital.nhs.uk/data-and-information/publications/statistical/nhs-workforce-statistics/nhs-workforce-statistics---april-2018>

Policy S4 Play and informal recreation

A Boroughs should:

- 1) prepare Development Plans that are informed by a needs assessment of children and young person's play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision. Boroughs should consider the need for cross-borough collaboration where appropriate
- 2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.

B Development proposals for schemes that are likely to be used by children and young people should:

- 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile
- 2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
 - a) provides a stimulating environment
 - b) can be accessed safely from the street by children and young people independently
 - c) forms an integral part of the surrounding neighbourhood
 - d) incorporates trees and/or other forms of greenery
 - e) is overlooked to enable passive surveillance
 - f) is not segregated by tenure
- 3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
- 4) for large-scale public realm developments, incorporate incidental play space to make the space more playable

- 5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future demand for play provision.

- 5.4.1 **Safe and stimulating play** is essential for children and young people's mental and physical health. It is not just an activity confined to playgrounds and play areas but is something that can be done in all aspects of a child's life, in a wide variety of locations and environments. Accessing a variety of opportunities for play and being able to be independently mobile within their neighbourhood, is important for children and young people's wellbeing and development. When preparing needs assessments, boroughs should consult with children and young people to ensure their needs are understood in terms of existing and future provision.
- 5.4.2 Many children and young people, however, find that there are limited opportunities for them to play in their local neighbourhood. This is often not because of a lack of formal play provision, but due to restrictive street design and layouts, poor links between spaces for play and recreation, and the threat of busy roads and traffic. Developments should **encourage children and young people to move around freely** through safe streets and footpath networks that connect to more formal play provision, green spaces and parks, and that follow the Healthy Streets Approach.
- 5.4.3 It should be recognised that children play in all sorts of spaces, including playgrounds, playing fields, skate parks and other recreation areas and this should generally be encouraged and taken account of in the design and layout of development. Where **formal play provision** is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating, and should balance the need to be safe whilst also providing an element of risk, which is important for children's development. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.
- 5.4.4 There should be **appropriate provision for different age groups**, including older children and teenagers. Particular consideration should be given to

Policy HC1 Heritage conservation and growth

- A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:
- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
 - 2) utilising the heritage significance of a site or area in the planning and design process
 - 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
 - 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
- C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of



archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

- E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

- 7.1.1 London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of **local, national and international value**. London's heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth. The Mayor will develop a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth.
- 7.1.2 London's **diverse range of designated and non-designated heritage assets** contributes to its status as a world-class city. Designated assets currently include four World Heritage Sites, over 1,000 conservation areas, 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows, ancient woodlands, and ancient and veteran trees. The distribution of designated assets differs across different parts of London, and is shown in [Figure 7.1](#), [Figure 7.2](#), [Figure 7.3](#), and [Figure 7.4](#). Note that these maps are for illustrative purposes only.



Policy HC2 World Heritage Sites

- A Boroughs with World Heritage Sites, and those that are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.
- B Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.
- C Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.
- D Up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

- 7.2.1 The UNESCO World Heritage Sites at Maritime Greenwich, Royal Botanic Gardens Kew, Palace of Westminster and Westminster Abbey including St Margaret's Church, and the Tower of London are among the most important cultural heritage sites in the world and are a key feature of London's identity as a world city. In ratifying the World Heritage Convention, the UK Government has made a commitment to **protecting, conserving, presenting and transmitting to future generations the Outstanding Universal Value of World Heritage Sites** and to protecting and conserving their settings. Much of this commitment is discharged by local authorities, including the GLA, through their effective implementation of national, regional, and local planning policies for conserving and enhancing the historic environment.
- 7.2.2 The context of each of the four London World Heritage Sites is markedly different and the qualities of each is conditioned by the character and form of its surroundings as well as other cultural, intellectual, spatial or functional



be accompanied by thorough evidence which demonstrates that there are exceptional circumstances consistent with the requirements of national policy.

- 8.3.3 Additional stretches of the River Thames should not be designated as Metropolitan Open Land, as this may restrict the use of the river for transport infrastructure related uses. In considering whether there are exceptional circumstances to change MOL boundaries alongside the Thames and other waterways, boroughs should have regard to Policy SI 14 Waterways – strategic role to Policy SI 17 Protecting and enhancing London’s waterways and the need for certain types of development to help maximise the multifunctional benefits of waterways including their role in transporting passengers and freight.
- 8.3.4 Proposals to **enhance access to MOL** and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.

Policy G4 Open space

A Development Plans should:

- 1) undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required.¹³⁶ Assessments should take into account the quality, quantity and accessibility of open space
- 2) include appropriate designations and policies for the protection of open space to meet needs and address deficiencies
- 3) promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change
- 4) ensure that open space, particularly green space, included as part of development remains publicly accessible.

¹³⁶

Areas of Deficiency in Access to Public Open Space, GiGL, <https://www.gigl.org.uk/open-spaces/areas-of-deficiency-in-access-to-public-open-space/?highlight=open%20space%20deficiency>



B Development proposals should:

- 1) not result in the loss of protected open space
- 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency.

- 8.4.1 Open spaces, particularly those planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a **vital component of London's infrastructure**. All types of open space, regardless of their function, are valuable in their ability to connect Londoners to open spaces at the neighbourhood level. Connectivity across the network of open spaces is particularly important as this provides opportunities for walking and cycling. Green spaces are especially important for improving wildlife corridors.
- 8.4.2 Boroughs should undertake an open space needs assessment, which should be in-line with objectives in **green infrastructure strategies** (Policy G1 Green infrastructure) (drawing from existing strategies such as play, trees and playing pitches). These strategies and assessments should inform each other to deliver multiple benefits in recognition of the cross-borough function and benefits of some forms of green infrastructure. Assessments should take into account all types of open space, including open space that is not publicly accessible, to inform local plan policies and designations.
- 8.4.3 The creation of new open space, particularly green space, is essential in helping to meet the Mayor's target of making more than 50 per cent of London green by 2050. **New provision or improved public access** should be particularly encouraged in areas of deficiency in access to public open space. It is important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and any conflicts between uses are minimised.
- 8.4.4 Proposals to **enhance open spaces** to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public access, inclusive design, recreation facilities, habitat creation, landscaping improvement or Sustainable Drainage Systems (SuDS).



Policy G5 Urban greening

- A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- B Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).
- C Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

- 8.5.1 The inclusion of **urban greening measures** in new development will result in an increase in green cover, and **should be integral to planning** the layout and design of new buildings and developments. This should be considered from the beginning of the design process.
- 8.5.2 **Urban greening** covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can help to meet other policy requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited. The management and ongoing maintenance of green infrastructure should be considered and secured through the planning system where appropriate.
- 8.5.3 A number of cities have successfully adopted a 'green space factor' to encourage more and better urban greening. The Mayor has developed a generic **Urban Greening Factor** model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments.



Notes for Table 8.2

- A. <https://livingroofs.org/intensive-green-roofs/>
- B. <http://www.tdag.org.uk/trees-in-hard-landscapes.html>
- C. <https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>
- D. <https://www.rhs.org.uk/advice/profile?pid=868>
- E. <http://www.susdrain.org/case-studies/>
- F. <https://www.rhs.org.uk/advice/profile?pid=351>
- G. <https://www.thenbs.com/knowledge/the-nbs-guide-to-facade-greening-part-two>
- H. <https://www.rhs.org.uk/advice/profile?PID=818>
- I. <https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>
- J. <https://www.susdrain.org/delivering-suds/using-suds/suds-components/source-control/pervious-surfaces/pervious-surface-types/pervious-surface-types.html>

Policy G6 Biodiversity and access to nature

- A Sites of Importance for Nature Conservation (SINCs) should be protected.
- B Boroughs, in developing Development Plans, should:
 - 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
 - 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
 - 3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
 - 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context



- 5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
- C Where harm to a SINIC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
- 1) avoid damaging the significant ecological features of the site
 - 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - 3) deliver off-site compensation of better biodiversity value.
- D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- E Proposals which reduce deficiencies in access to nature should be considered positively.

8.6.1 **Sites of Importance for Nature Conservation (SINCs)** comprise:

1. Sites of Metropolitan Importance – strategically-important conservation sites for London
2. Sites of Borough Importance – sites which support habitats or species of value at the borough level
3. Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.

Several Sites of Metropolitan Importance also have statutory European or national nature conservation designations (see paragraph 8.6.3)

8.6.2 The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks. When undertaking comprehensive reviews of SINCs across a borough, or when identifying or amending Sites of Metropolitan Importance, boroughs should consult the London Wildlife Sites Board.



Policy G8 Food growing

A In Development Plans, boroughs should:

- 1) protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites
- 2) identify potential sites that could be used for food production.

- 8.8.1 Providing land for food growing helps to support the **creation of a healthier food environment**. At the local scale, it can help promote more active lifestyles and better diets, and improve food security. Community food growing not only helps to improve social integration and community cohesion but can also contribute to improved mental and physical health and wellbeing.
- 8.8.2 As provision for **small-scale** food growing becomes harder to deliver, innovative solutions to its delivery should be considered, such as green roofs and walls, re-utilising existing under-used spaces and incorporating spaces for food growing in community schemes such as in schools. Where sites are made available for food growing on a temporary basis landowners/developers will need to be explicit over how long sites will be available to the community.
- 8.8.3 At a more **macro scale**, providing land for food growing helps to support farming and agriculture. Providing food closer to source helps to create a sustainable food network for the city, supports the local economy, and reduces the need to transport food, thereby reducing transport emissions and helping to address climate change. There are also longer-term biodiversity benefits, and farmers adopting agri-environmental stewardship schemes are more likely to deliver good environmental practice. For all food growing, consideration should be given to the historic use of the land and any potential contamination.
- 8.8.4 The **Mayor's Food Strategy** prioritises the need to help all Londoners to be healthier and for the food system to have less of a negative environmental impact.
- 8.8.5 The **Capital Growth network** is London's food growing network, which continues to promote community food growing across the capital, as well as delivering food-growing skills and employment opportunities for Londoners.



Policy SI 1 Improving air quality

- A Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.
- B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:
- 1) Development proposals should not:
 - a) lead to further deterioration of existing poor air quality
 - b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
 - c) create unacceptable risk of high levels of exposure to poor air quality.
 - 2) In order to meet the requirements in Part 1, as a minimum:
 - a) development proposals must be at least Air Quality Neutral
 - b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures
 - c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
 - d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.
- C Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:

- 1) how proposals have considered ways to maximise benefits to local air quality, and
 - 2) what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.
- D In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.¹⁴⁷
- E Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

¹⁴⁷ The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance, Mayor of London, 2014

- 9.1.1 **Poor air quality** is a major issue for London which is failing to meet requirements under legislation. Poor air quality has direct impacts on the health, quality of life and life expectancy of Londoners. The impacts tend to be most heavily felt in some of London's most deprived neighbourhoods, and by people who are most vulnerable to the impacts, such as children and older people. London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced.
- 9.1.2 The Mayor is committed to **making air quality in London the best of any major world city**, which means not only achieving compliance with legal limits for Nitrogen Dioxide as soon as possible and maintaining compliance where it is already achieved, but also achieving World Health Organisation targets for other pollutants such as Particulate Matter.
- 9.1.3 The aim of this policy is to ensure that new developments are designed and built, as far as is possible, **to improve local air quality and reduce the extent to which the public are exposed to poor air quality**. This means that new developments, as a minimum, must not cause new exceedances of legal air



Note for Figure 9.5: For the most up to date broadband coverage and information on broadband connection types please see <https://www.london.gov.uk/what-we-do/business-and-economy/supporting-londons-sectors/connectivity>

Policy SI 7 Reducing waste and supporting the circular economy

- A Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:
- 1) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
 - 2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products
 - 3) ensure that there is zero biodegradable or recyclable waste to landfill by 2026
 - 4) meet or exceed the municipal waste recycling target of 65 per cent by 2030¹⁶³
 - 5) meet or exceed the targets for each of the following waste and material streams:
 - a) construction and demolition – 95 per cent reuse/recycling/recovery
 - b) excavation – 95 per cent beneficial use¹⁶⁴
 - 6) design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

¹⁶³ Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes business waste collected by local authorities and by the private sector.

¹⁶⁴ All inert excavation waste should be used for beneficial uses.



- B Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:
- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
 - 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
 - 3) opportunities for managing as much waste as possible on site
 - 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
 - 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
 - 6) how performance will be monitored and reported.
- C Development Plans that apply circular economy principles and set local lower thresholds for the application of Circular Economy Statements for development proposals are supported.

- 9.7.1 Waste is defined as anything that is discarded. A **circular economy** is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. London should move to a more circular economy as this will save resources, increase the resource efficiency of London's businesses, and help to reduce carbon emissions. The successful implementation of circular economy principles will help to reduce the volume of waste that London produces and has to manage. A key way of achieving this will be through incorporating circular economy principles into the design of developments (see also [Policy D3 Optimising site capacity through the design-led approach](#)) as well as through Circular Economy Statements for referable applications.
- 9.7.2 The adoption of circular economy principles for referable applications means creating a built environment where buildings are designed for **adaptation, reconstruction and deconstruction**. This is to extend the useful life of buildings and allow for the salvage of components and materials for reuse or recycling. Un-used or discarded materials should be brought back to an equal or



Policy SI 4 Managing heat risk

- A Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- B Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure
 - 2) minimise internal heat generation through energy efficient design
 - 3) manage the heat within the building through exposed internal thermal mass and high ceilings
 - 4) provide passive ventilation
 - 5) provide mechanical ventilation
 - 6) provide active cooling systems.

9.4.1 Climate change means London is already experiencing higher than historic average temperatures and more severe hot weather events. This, combined with a growing population, urbanisation and the urban heat island effect, means that **London must manage heat risk** in new developments, using the cooling hierarchy set out above. Whilst the cooling hierarchy applies to major developments, the principles can also be applied to minor development.

9.4.2 In managing heat risk, new developments in London face two challenges – the need to ensure London does not overheat (the urban heat island effect) and the need to ensure that individual buildings do not overheat. **The urban heat island effect** is caused by the extensive built up area absorbing and retaining heat during the day and night leading to parts of London being several degrees warmer than the surrounding area. This can become problematic on the hottest days of the year as daytime temperatures can reach well over 30°C and not drop below 18°C at night. These circumstances can lead many people to feel too hot or not be able to sleep, but for those with certain health conditions, and 'at risk' groups such as some young or elderly Londoners, the effects can be serious



- 9.11.5 The United Kingdom Onshore Oil and Gas Group (UKOOG), which represents the industry, has established a **Community Engagement Charter** for new onshore oil and gas proposals.¹⁷² The Charter sets out a number of commitments for operators which includes engagement with local communities at each of the three main stages of operations (exploration, appraisal and production). Where any proposals for fracking to come forward, applicants who are members of UKOOG would be expected to comply with these commitments.

Policy SI 12 Flood risk management

- A Current and expected flood risk from all sources (as defined in paragraph 9.2.12) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.
- B Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should cooperate and jointly address cross-boundary flood risk issues including with authorities outside London.
- C Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- D Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.
- E Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

¹⁷² Community Engagement Charter – oil and gas from unconventional reservoirs, UKCOOG, 2013, <http://www.ukoog.org.uk/community/charter>



- F Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.
- G Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.

- 9.12.1 In London, the boroughs are **Lead Local Flood Authorities** (LLFAs) and are responsible, in particular, for local surface water flood risk management and for maintaining a flood risk management assets register. They produce Local Flood Risk Management Strategies. LLFAs should cooperate on strategic and cross-boundary issues.
- 9.12.2 The **Regional Flood Risk Appraisal** (RFRA) considers all sources of flood risk including tidal, fluvial, surface water, sewer, groundwater and reservoir flooding and has been updated in collaboration with the Environment Agency. The RFRA provides a spatial analysis of flood risk including consideration of risks at major growth locations such as Opportunity Areas and Town Centres and key infrastructure assets. The Government's updated allowances for climate change are reflected in the expected sea level rise and increased flood risks considered in the RFRA. The updated allowances consider the lifetime, vulnerability and location of a development.
- 9.12.3 The **Thames Estuary 2100 Plan** (TE2100), published by the Environment Agency, and endorsed by Government, focuses on a partnership approach to tidal flood risk management. It requires the ability to maintain and raise some tidal walls and embankments. The Environment Agency estimates that a new Thames Barrier is likely to be required towards the end of the century. Potential sites will be needed in Kent and/or Essex requiring close partnership working with the relevant local authorities.
- 9.12.4 The concept of Local Authorities producing **Riverside Strategies** was introduced through the TE2100 Plan to improve flood risk management in the vicinity of the river, create better access to and along the riverside, and improve the riverside environment. The Mayor will support these strategies.



- 9.12.5 The Environment Agency's Thames River Basin District **Flood Risk Management Plan** is part of a collaborative and integrated approach to catchment planning for water. Measures to address flood risk should be integral to development proposals and considered early in the design process. This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Natural flood risk management in the upper river catchment areas can also help to reduce risk lower in the catchments. Making space for water when considering development proposals is particularly important where there is significant exposure to flood risk along tributaries and at the tidal-fluvial interface. The Flood Risk Management Plan should inform the boroughs' Strategic Flood Risk Assessments.
- 9.12.6 In terms of mitigating **residual risk**, it is important that a strategy for resistance and then resilience including safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services. In the case of a severe flood, especially a tidal flood, many thousands of properties could be affected. This will make rescue and the provision of temporary accommodation challenging. Designing buildings such that people can remain within them and be safe and comfortable in the unlikely event of such a flood, will improve London's resilience to such an event.

Policy SI 13 Sustainable drainage

- A Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.
- B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:
- 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
 - 2) rainwater infiltration to ground at or close to source
 - 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)



- 4) rainwater discharge direct to a watercourse (unless not appropriate)
 - 5) controlled rainwater discharge to a surface water sewer or drain
 - 6) controlled rainwater discharge to a combined sewer.
- C Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.
- D Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

- 9.13.1 London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as ensuring that appropriate maintenance arrangements are put in place. **Local Flood Risk Management Strategies and Surface Water Management Plans** should ensure they address flooding from multiple sources including surface water, groundwater and small watercourses that occurs as a result of heavy rainfall.
- 9.13.2 Development proposals should aim to get as close to greenfield run-off rates¹⁷³ as possible depending on site conditions. The **well-established drainage hierarchy** set out in this policy helps to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible. There should be a preference for green over grey features, and drainage by gravity over pumped systems. A blue roof is an attenuation tank at roof or podium level; the combination of a blue and green roof is particularly beneficial, as the attenuated water is used to irrigate the green roof.
- 9.13.3 For many sites, it may be appropriate to use **more than one form of drainage**, for example a proportion of rainwater can be managed by more sustainable methods, with residual rainwater managed lower down the hierarchy. In some cases, direct discharge into the watercourse is an appropriate approach, for example rainwater discharge into the tidal Thames or a dock. This should include suitable pollution prevention filtering measures, ideally by using soft engineering or green infrastructure. In addition, if direct discharge is to a watercourse where

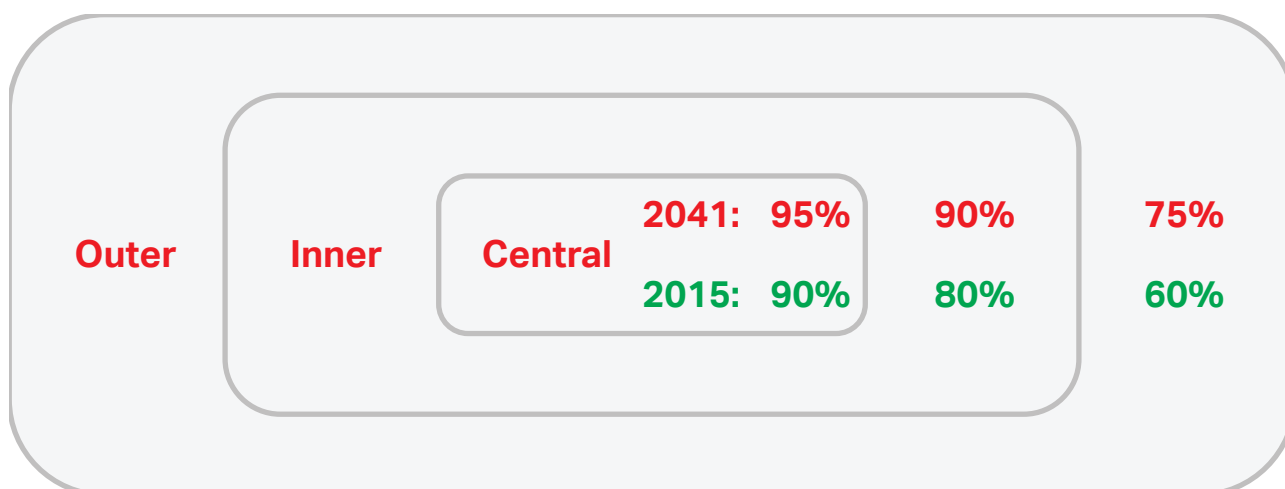
173

The runoff that would occur from a site in undeveloped natural state.



- 10.1.4 **Rebalancing the transport system towards walking, cycling and public transport**, including ensuring high quality interchanges, will require sustained investment including improving street environments to make walking and cycling safer and more attractive, and providing more, better-quality public transport services to ensure that alternatives to the car are accessible, affordable and appealing. Achieving this is expected to result in different outcomes in different places, including modal splits in central, inner and outer London, as shown by Figure 10.1.
- 10.1.5 The **Mayor’s Transport Strategy** provides more detail on the holistic approach that needs to be taken by all stakeholders to achieve these aims.

Figure 10.1 - Change in mode shares within central, inner and outer London expected to be required for a city-wide shift from 63 to 80 per cent share for walking, cycling and public transport



Policy T2 Healthy Streets

- A Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.
- B Development Plans should:
 - 1) promote and demonstrate the application of the Mayor’s Healthy Streets Approach to: improve health and reduce health inequalities; reduce

car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.

- 2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.
- C In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.
- D Development proposals should:
- 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance
 - 2) reduce the dominance of vehicles on London's streets whether stationary or moving
 - 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

10.2.1 **Streets** account for 80 per cent of London's public spaces. High quality streets are fundamental to the character and efficient functioning of the city, and play a fundamental role in moving people around safely, improving public realm and providing spaces for people to come together. Successful streets are inclusive and provide for the various requirements of their users.

10.2.2 This Plan supports the implementation of the Mayor's Transport Strategy which aims to deliver the infrastructure and public realm required to **significantly increase levels of walking, cycling and public transport use** throughout London. It aims to make the city more accessible, inclusive, safe and welcoming to all, so that every Londoner can be active every day, creating a healthier city for people from all backgrounds, ensuring inequalities are reduced.

10.2.3 The **Healthy Streets Approach** is an evidence-based approach to improve health and reduce health inequalities, which will help Londoners use cars less, and walk, cycle and use public transport more. It supports the delivery of the

Policy T4 Assessing and mitigating transport impacts

- A Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- B When required in accordance with national or local guidance,¹⁷⁹ transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.¹⁸⁰
- C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.
- D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.
- E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.
- F Development proposals should not increase road danger.

¹⁷⁹ <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>

¹⁸⁰ <https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants>

Policy T5 Cycling

- A Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:
- 1) supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure
 - 2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in [Table 10.2](#) and [Figure 10.3](#), ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.
- B Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.¹⁸² Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
- C Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.
- D Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.
- E Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.

¹⁸²

London Cycling Design Standards, Transport for London, <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2>

F Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

Table 10.2 - Minimum cycle parking standards*

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
A1	food retail above 100 sqm	1 space per 175 sqm gross external area (GEA)	<p>areas with higher cycle parking standards (see Figure 10.3):</p> <ul style="list-style-type: none"> • first 750 sqm: 1 space per 20 sqm; • thereafter: 1 space per 150 sqm (GEA) <p>rest of London:</p> <ul style="list-style-type: none"> • first 750 sqm: 1 space per 40 sqm; • thereafter: 1 space per 300 sqm (GEA)
	non-food retail above 100 sqm	<ul style="list-style-type: none"> • first 1000 sqm: 1 space per 250 sqm • thereafter: 1 space per 1000 sqm (GEA) 	<p>areas with higher cycle parking standards (see Figure 10.3):</p> <ul style="list-style-type: none"> • first 1000 sqm: 1 space per 60 sqm; • thereafter: 1 space per 500 sqm (GEA) <p>rest of London:</p> <ul style="list-style-type: none"> • first 1000 sqm: 1 space per 125 sqm; • thereafter: 1 space per 1000 sqm (GEA)

long-stay spaces and where the full provision could not otherwise be provided. Provision of cycle hire caters for a different market of cyclist and also should not be accepted in lieu of cycle parking.

- 10.5.10 Where standards are based on floorspace, these have been calculated on the basis of the level of demand and potential growth in relation to Gross External Area (GEA). This calculation already takes into account that not all of the area covered by GEA will generate cycling trips.

Policy T6 Car parking

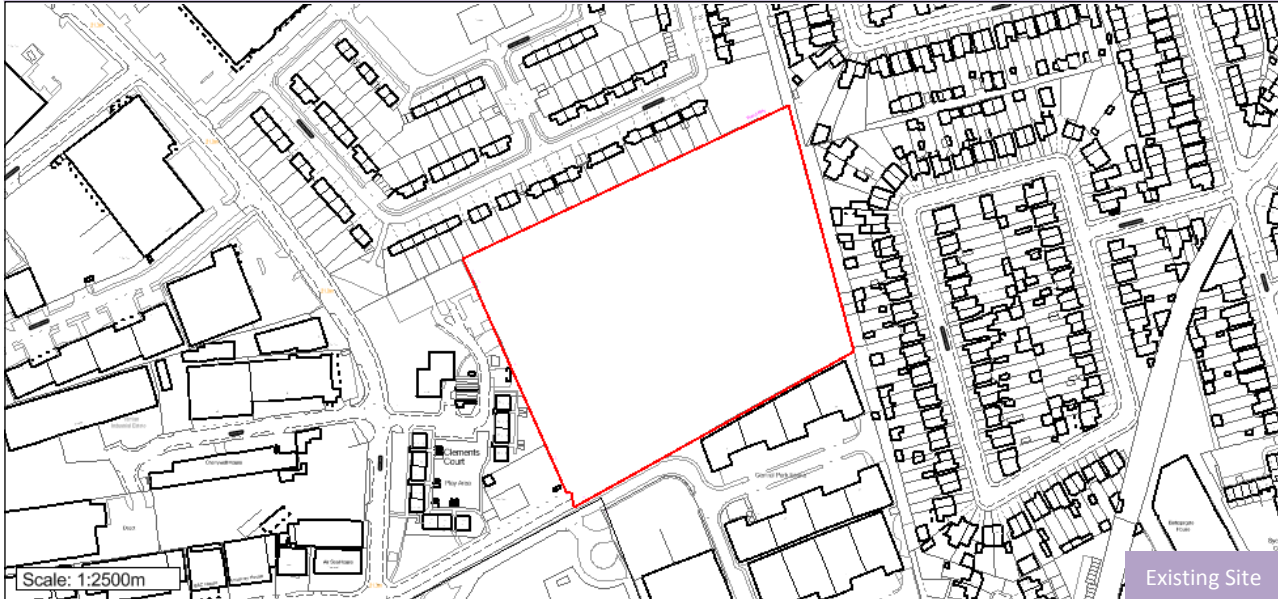
- A Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.
- B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.
- C An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.
- D The maximum car parking standards set out in [Policy T6 .1 Residential parking](#) to [Policy T6 .5 Non-residential disabled persons parking](#) should be applied to development proposals and used to set local standards within Development Plans.
- E Appropriate disabled persons parking for Blue Badge holders should be provided as set out in [Policy T6 .1 Residential parking](#) to [Policy T6 .5 Non-residential disabled persons parking](#).
- F Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all use classes.
- G Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with [Policy T6 .1 Residential parking](#), [Policy T6 .2 Office Parking](#), [Policy T6 .3 Retail parking](#), and [Policy T6 .4 Hotel and leisure uses parking](#).

All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.

- H Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.
- I Adequate provision should be made for efficient deliveries and servicing and emergency access.
- J A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.
- K Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in [Policy T6 .1 Residential parking](#)) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential use classes in any part of London.
- L Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.

- 10.6.1 To manage London’s road network and ensure that people and businesses can move about the city as the population grows and housing delivery increases significantly, new parking provision must be carefully controlled. The **dominance of vehicles on streets** is a significant barrier to walking and cycling, reduces the appeal of streets as public places and has an impact on the reliability and journey times of bus services. Reduced parking provision can facilitate higher-density development and support the creation of mixed and vibrant places that are designed for people rather than vehicles. As the population grows, a

45 - Land at Green Lane



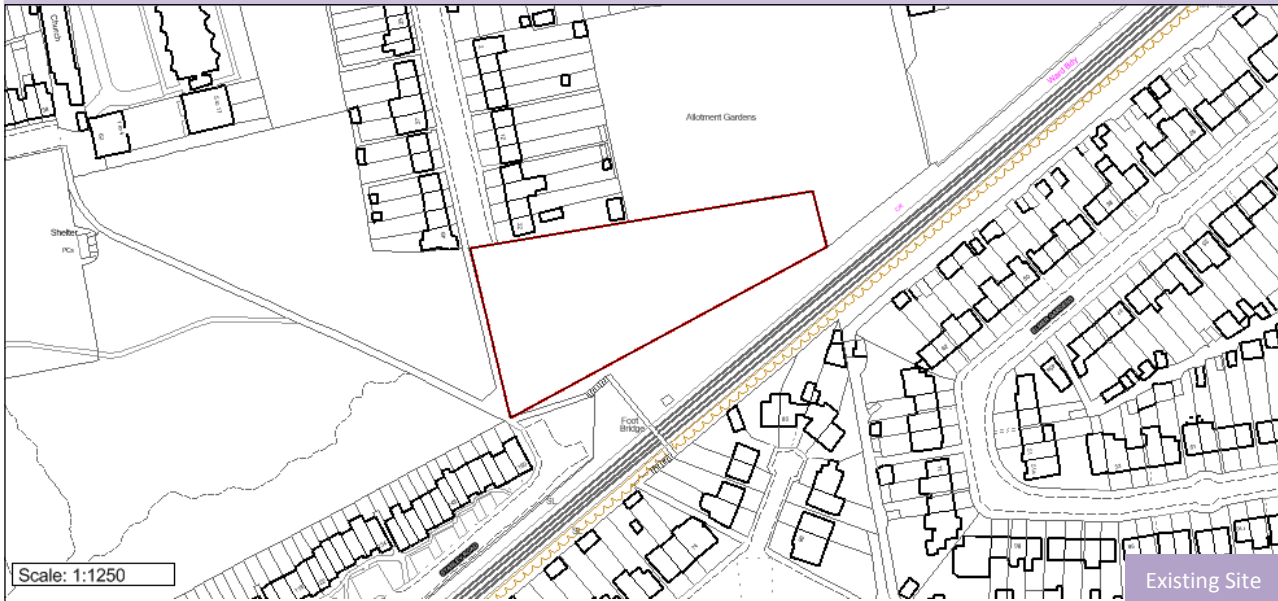
Address	Land at Green Lane, Hounslow, Cranford Ward, TW4 5DJ		
Place	Cranford and Heston	Site Size	3.1 Ha
PTAL 2018	2/1b	Existing Use	Allotment
Ownership	Public	Site Source	Call for Sites 2016
Planning Designations	Land Quality; Development will be subject to compliance with Policy WOB3, and Policy E8 of the Local Plan in order that any contamination and any historic landfill is properly considered and addressed as part of any development.		

Minimum Development Quantum			
Residential Units (C3)	0	Retail(A1-A4) (Sqm)	
Business (B1a, B1b)(Sqm)		Industrial (B1c, B2, B8)(Sqm)	10270
Parking (Sqm)		Hotel (C1) (Sqm)	
Health/Community (D1) (Sqm)		Assembly/Leisure (D2) (Sqm)	
Phasing	2019-2024		

Development Details

Key Proposal	Land at Green Lane will be redeveloped to provide new industrial business space and units to support the borough's future employment needs.
Land Uses	Industrial (B2/B8)
Movement and Access:	Access to the site should be maintained from the Green Lane and should to contribute towards meeting the modal shift targets in the London Transportation Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.
Site Requirements:	Redevelopment of site for industrial uses. Development should support function, attractiveness and competitiveness of the location for employment by integrating with and not harming the function of adjacent employment sites, and should have regard to proposed development on the adjacent Central Park Trading Estate site. Development should mitigate any negative impact on adjoining Green Belt, MOL and/or Open space, with a green buffer created between the developable portion of the site and areas of designated open space.

89 - Land at James Street



Existing Site



Site Oblique

Address	Land at James Street, James Street, Hounslow Central Ward, TW3 1SP		
Place		Site Size	0.5 Ha
PTAL 2018	1a/1b	Existing Use	Allotment
Ownership	Public	Site Source	Call for Sites 2016
Planning Designations & Heritage Constraints	Site is Local Open Space: development should enhance the provision of publicly accessible Local Open Space through onsite provision (see local Plan policy GB2); Land Quality; Development will be subject to compliance Policy E8 of the Local Plan in order that any contamination and any historic landfill is properly considered and addressed as part of any development.		

Minimum Development Quantum

Residential Units (C3)	70	Retail(A1-A4) (Sqm)	
Business (B1a, B1b)(Sqm)		Light Industrial (B1c)(Sqm)	
Industrial (B2,B8)(Sqm)		Hotel (C1) (Sqm)	
Health/Community (D1) (Sqm)		Assembly/Leisure (D2) (Sqm)	
Parking (Sqm)		Phasing	2019-2024

Development Details

Site Description	The site is bounded to the north and east by residential development, and by a railway line to the south. The site is not designated. A SINC is adjacent to the site to the south.
Proposed Use	Residential (C3)
Justification	Redevelopment of the site to introduce residential development. Development should provide an attractive and sensitive boundary to adjacent open space which maintains a sense of openness and enables greater access for occupiers of both new and existing development, including provision of public access through and across the site. The height of new development should start from the predominant character of the area when developing densities, and should consider the adjacent to areas of different character steps up from existing height in order to form a sensitive and legible change in character while maximising density. The specific level of car parking provision for residential units should be significantly lower than 1 car parking space per residential unit (likely to be 0.5 car parking space per unit). The existing level of traffic congestion would also be a factor in seeking to minimise future parking provision.

Appendix 3 Committee Report and Addendum

References:	P/2020/4292	00707/E/P120
Address:	Park Road Allotments, Park Road, Isleworth, London (Isleworth)	
Proposal:	Erection of 80 residential dwellings, concierge building, car and cycle parking, landscaping and associated works; and infrastructure and other structures associated with allotment use.	

This application is being taken to Planning Committee as a Major scheme with a Legal Agreement.

1.0 SUMMARY

- 1.1 The proposal is for the development of the allotment site at Park Road for housing. The proposed development comprises the removal of the existing small garden shed structures associated with the current use of the site as allotments and erection of 80 homes, comprising a mix of houses and flats, with car and cycle parking, landscaping and other associated works. The proposal would also re-provide 38 allotments (3,553sq.m when including associated paths and spaces) that would equate to 30% of the existing 11,700sq.m of allotments on site.
- 1.2 The development comprises a mixture of Build to Rent (BtR), including 32 Discounted Market Rent (DMR) homes to be retained in the long-term ownership and management of Northumberland Estates.
- 1.3 The proposal offers heritage benefits to the Grade I listed Syon House (and associated Grade I listed park) through the revenue generated by the development while also incorporating 40% (per home) affordable housing (32 homes) in the form of DMR and securing 30 homes (in the form of BtR) dedicated for key workers at the nearby West Middlesex University Hospital, which carry significant weight in planning terms and the combined public benefit would outweigh the partial loss of Local Open Space.
- 1.4 The proposal is considered to be of a high quality design that would preserve the character and appearance of the Isleworth Riverside Conservation Area or would harm the nearby listed buildings and would not unacceptably harm neighbours living conditions or the local highway network. The proposal would provide an acceptable standard of accommodation and would be highly sustainable achieving a 78% reduction in CO2 emissions.

On balance, planning approval is therefore recommended subject to conditions and the satisfactory negotiation of a legal agreement.

2.0 SITE DESCRIPTION

- 2.1 The site currently comprises 37 non-statutory allotments managed by Northumberland Estates. It is a roughly triangular plot covering 1.16ha and is to the south west and outside of Syon Park. It fronts Park Road which forms its north-eastern boundary; its north-western boundary follows Snowy Fielder Way; and its south-eastern boundary follows the plot lines of the properties on Church Street. The churchyard of All Saints Church abuts the site to the south and to the north-west is Charlotte House Care Home, with West Middlesex University Hospital beyond. Historic Old Isleworth lies to the south, with more modern housing along Snowy Fielder Way to the north.
- 2.2 The site is on the opposite side of Park Road to the of Syon Park boundary wall. The Royal Botanic Gardens Kew World Heritage Site lies to the south of Syon Park on the opposite side of the River Thames. While the site lies within this historic setting, the character of Park Road itself has changed over time with the modern hospital and housing in close proximity. There are a number of Grade I, II, and II* listed buildings within Syon Park and in the general vicinity of the site.
- 2.3 The site is designated as Local Open Space but public accessibility is restricted to allotment holders and their family and friends. The existing structures on the site consist of small garden sheds, which serve the current allotments. There are a number of mature trees within the site and an avenue of mature Lime trees beyond the site boundary that lead to the Church.
- 2.4 The site is located approximately 1.4 km south of Syon Lane Station. Isleworth Station is approximately 1.6 km to the north-west and Brentford Station is approximately 2.4km to the north-east. Several bus routes run along Twickenham Road and London Road, providing services to Brentford, White City, Hammersmith, Hounslow and Heathrow. The site is not within a Controlled Parking Zone (CPZ) though the Church Street/Mill Plat CPZ does operate on the streets to the south of the site. The site has a Public Transport Accessibility Level (PTAL) of 1b/2 (very low).
- 2.5 There are a number of footpaths and footways surrounding the site, offering access to Syon Park and strategic roads, including Twickenham Road and London Road.
- 2.6 The site is in the Isleworth Riverside Conservation Area and is designated as Local Open Space. It is also within an Archaeological Priority Zone. The site is close (approximately 13m) to the Royal Botanic Gardens Kew World Heritage Site Buffer Zone and the boundary of Syon Park (approximately 13m), a Grade I listed historic park and garden.
- 2.7 According to the Environment Agency's Flood Zone Maps, the site is located in Flood Zone 3b (i.e. land having a risk of more than a 1 in 100 annual probability (1%) of river flooding.) but does benefit from being protected by flood defences.
- 2.8 The site is also an Asset of Community Value.
- 2.9 An aerial image of the site is included below:



Figure 1: Site Location Plan

2.10 Constraints:

- Local Open Space
- Isleworth Riverside Conservation Area
- Archaeological Priority Zone
- Flood Zone 3b

3.0 **PLANNING HISTORY**

3.1 There is one relevant planning application that directly relates to the application site. However, there is an extensive planning history to the nearby Syon House and Park with some being material considerations to the current application that have also been listed separately below.

3.2 Park Road Allotments (the site)

00707/E/P110 Erection of eight blocks of three- and four- storey buildings to create 119 flats and eight houses with car parking at basement and street level and associated works.

(This application had a twin application at Syon House and Park with a reference: 00707/E/P111 listed below)

Refused and Dismissed at Public Inquiry: 29/11/2018

Reasons for being dismissed:

- The proposal would result in the loss of Local Open Space without its replacement by equivalent or better allotments contrary to the above Policies in the development plan.

3.3 Syon House and Park

00707/E/P93 Erection of a 155-bedroom hotel & health spa, covered walkway, glass house, creation of service access from London Road, the reinstatement of the historic landscape at Syon Park including formal and informal landscaping reconfiguration of car parking and garden centre storage areas and demolition of various buildings.

Approved (with Legal Agreement): 08/03/2004

00707/E/P97 Erection of a temporary marquee for five years for daytime and evening private/corporate events from 1st May to 30th September for each year period for 2009, 2010, 2011, 2012, and 2013.

Approved (with Legal Agreement): 22/01/2010

00707/E/P98 Alterations to the approved and substantially completed approved scheme (reference 00707/E/P93) for the erection of a 155-bedroom hotel involving use of the second floor roof loft area of the bedroom wing as guest lounges and a servery kitchen, together with formation of a roof terrace on the single storey conference wing and alterations to room layouts.

Approved (with Legal Agreement): 13/05/2010

00707/E/P99 Construction of a temporary (3 years) single storey garden centre sales building.

Approved: 30/06/2010

00707/E/P100 The refurbishment of existing adventure warehouse and the construction of an outdoor maze.

Approved: 25/06/2010

00707/E/P105 Refurbishment of existing adventure warehouse and construction of an outdoor maze.

Approved: 30/11/2012

00707/E/P106 Change of use of garden to erect a temporary marquee every year for 10 years between 1st May and 30th September for

daytime and evening private/ corporate events from 2014 to 2023 Inclusive.

Approved (with Legal Agreement): 29/07/2013

00707/E/P107 Variation of condition 1 of approved planning permission 00707/E/P106 dated 29/07/2013 to read as follows: The permission hereby granted shall be for a limited period of nine years for the erection of the marquee from 1st May to 30th September for each consecutive year and the permission shall expire on 30th September 2023 when the use shall cease and the marquee removed within one week of that date. For 2015 only, the erection of the marquee will be extended to 31st October to cater for seven events relating to the 2015 Rugby World Cup. The site of the marquee shall be made good, levelled and laid to grass no later than one month after its removal for each yearly period.

Approved (with Legal Agreement): 27/11/2014

00707/E/P111 Formation of a new allotment area with associated infrastructure.

(This application had a twin application at Park Road Allotments with a reference: 00707/E/P110 listed above)

Refused and Dismissed at Public Inquiry: 29/11/2018

Reasons for being dismissed:

- The proposed allotments would result in less than substantial harm in terms of paragraph 196 of the National Planning Policy Framework (NPPF) to the Grade I Registered Park and Garden, the setting and thus significance of the Grade I listed Lion Gate and the character and appearance of the Isleworth Riverside Conservation Area which were not outweighed by public benefits.
- The replacement allotments on this site would be likely to discourage the continued use of allotments in the local area contrary to HLP Policy GB8 and the Council's Allotment Strategy.

4.0 DETAILS

4.1 This application proposes to develop the site through the erection of 10 buildings (known as Blocks A, B, C, D, E1, E2, F, G1, G2 and G3) ranging between two to three storeys in height with accommodation at roof level that would provide 80 residential homes, comprising a mix of flats and houses. The development also incorporates associated access and other works including the provision of pedestrian footpaths, cycle parking, refuse storage and landscaping including amenity space and play equipment. The development incorporates a basement

that comprises car and cycle parking as well as waste stores and plant equipment.

- 4.2 The proposal incorporates 38 allotments, which would have an average of 60sq.m and an overall reduction of 8,147sq.m in allotment provision.
- 4.3 The residential homes comprise 48 Build to Rent homes (BtR), and 32 Discounted Market Rent (DMR) homes. 30 of the 48 BtR homes would be secured for key workers for the West Middlesex University Hospital through a long lease. The remainder of the homes would be retained in the long-term ownership and management of Northumberland Estates. Eight wheelchair accessible homes (10%) are proposed as part of the scheme. The mix would break down as follows:

	Home Size					Total
	Studio	1B2P	2B3P	2B4P	3B5P	
BtR (Northumberland Estates)	1	11	0	6	0	18
BtR (Hospital)	0	3	0	24	3	32
DMR (70% of the GLA's average market rent)	0	10	1	2	6	19
DMR (rents to be charged at London Living Rent)	0	1	2	8	2	13
Total no. of homes	1	25	3	40	11	80
Wheelchair accessible homes	0	5	3	0	0	8
Percentage	1%	31%	4%	50%	14%	100%

- 4.4 The revenue of development would be secured for heritage restoration works to the Grade I listed Syon House and the Grade I listed Syon Park.
- 4.5 Across the site the proposal incorporates a mix of duplex apartments and flats that benefit from a mix of private gardens or balconies and shared amenity spaces. Block G3 would be two storeys in height, Blocks A, D, E1, E2, F, G1 and G2 would be three storeys in height and Blocks B and C would be four storeys in height. Access to the homes comprises a mix of direct entrances from the street, internal cores and external deck accesses. The external deck accesses provide upper floor connections to Blocks A, B, C, D, E1 and E2. Block D comprises a concierge service at ground floor level, a community room at first floor and storage at second floor level.
- 4.6 Blocks A, B, C, D, E1, E2, G1, G2 and G3 all have rectangular plans with standard pitched roofs. Block F is formed of two rectangular forms that both have pitched roofs that run parallel to one another with disjointed elements projecting at opposite ends with a section of flat roof in the centre. The architecture includes arches, crescent, pitched roofs and dormer elements. The buildings would be finished in brickwork while the roof would be clad in bronze coloured metal shingles and the windows would be metal framed (charcoal

colour). Metal balconies, railings and rainwater goods to be charcoal colour. Copings to be sand coloured reinforced concrete.

- 4.7 The proposal includes relocating the main vehicular access to Snowy Fielder Way, while retaining the existing Park Road access for larger vehicles, such as refuse vehicles, and emergency services. 48 parking spaces including four Blue Badge parking spaces are proposed for the proposed homes. 41 of these would be within the basement with the remaining seven at ground level and equates to 0.6 spaces per home. One Blue Badge parking space is proposed for the allotment users. 20% of the car parking spaces would be provided with active electric vehicle (EV) charging points, with the remaining spaces provided with passive infrastructure to enable easy conversion in the future.
- 4.8 The proposal incorporates 147 long term cycle parking for the future residents of the proposal spread between the basement, in between the proposed block and within the blocks or private gardens. The long term spaces would comprise a mixture of two-tier racks and Sheffield stands. Visitor cycle parking spaces would be provided for in the form of Sheffield stands for the residential element (6 spaces) and the allotment element (4 spaces).
- 4.9 An extract of the proposed site plan is included below (Figure 2):

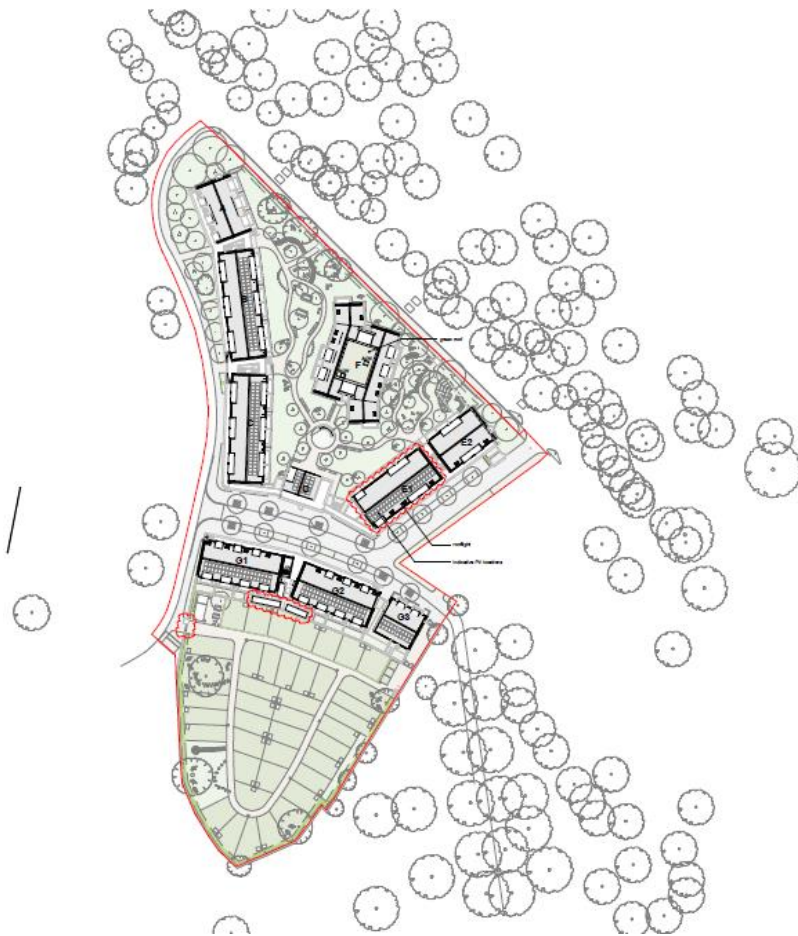


Figure 2: Proposed Site Plan

- 4.10 Elevations of the proposed blocks are included below (Figures 3-7):



Figure 3: Elevations of Block A, B and C



Figure 4: Elevations of Block D



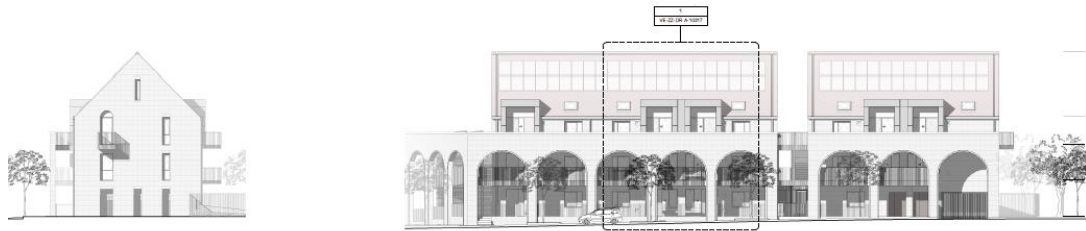


Figure 5: Elevations of Blocks E1 and E2



Figure 6: Elevations of Block F



Figure 7: Elevations of Blocks G1, G2 and G3

4.11 Amendments received on 23/04/2021

- Enhancement of allotment entrance arch
- Relocation of solar panels on roof of Block E to southern elevation

- Reconfiguration of gate to Block G in response to comments on potential anti-social behaviour
- Revised arrangement of allotment parking space in response to highways officer comments and associated extension of the public footpath
- Introduction of cages for main bicycles to be stored in the basement in response to the Designing Out Crime Officer's (DOCO) comments
- Addition of CCTV within the gallery spaces in response to DOCO comments
- Additional 3D visual of scheme looking east along Church Walk

4.12 Amendments received on 06/07/2021

- Revised affordable housing offer proposing 40% by unit (43% by habitable room)

4.13 Amendments received on 09/08/2021

- Amendments to refuse strategy and associated changes to stair core and cycle parking between Blocks A, B and C

4.14 Amendments received on 09/09/2021

- Updated plans to correct inconsistencies of Block E PVs

4.15 Amendments received on 24/09/2021

- Additional PVs on Block E2
- Cycle parking added at allotment entrance (correcting error)
- Correction to add divider between Flat F.01 and F.02 amenity spaces
- Revised Energy Statement

4.16 The amendments received during the course of the application process are considered to be minor and not materially alter the proposal and would not prejudice any third parties. Therefore re-consultation was not required.

4.17 Main differences between the current proposal and the previous applications (Ref: 00707/E/P110 & 00707/E/P111 that were refused and dismissed at Public Inquiry:

4.18 The current application would result in a partial loss of the Local Open Space due to retaining some allotment space on the site rather than re-developing the whole site.

4.19 The current application would retain all 38 existing allotments on site rather than proposing to re-locate them within the grounds of Syon Park.

- 4.20 The current application would have an approximate allotment size of 60sq.m while the previous applications had a mixture comprising 21 x 250sq.m, 6 x 187sq.m and 10 x 125sq.m.
- 4.21 The current application has not been submitted as 'Enabling Development' whereas the previous applications were.
- 4.22 The current application comprises 80 homes with a combination of Build to Rent, Discount Market Rent and London Living Rent with an overall affordable housing provision of 40% (per home). The previous applications comprised 127 homes in the form of Private Rented Sector housing with no affordable housing provision.
- 4.23 The current application's housing mix is very similar to that of the previous application. However, the current application does incorporate a modest increase in the number family sized homes.
- 4.24 The current application would result in a reduction in CO2 of 78% whereas the previous applications would have resulted in a reduction in CO2 of 36%.

5.0 CONSULTATIONS

- 5.1 The application has been drawn to members' attention on the weekly pending decision list dated 24th March – 31st March 2021 (Week 12) as a Major Scheme. There was no request to call this in to the Development on Council Land Forum.
- 5.2 279 neighbouring properties were consulted by letter on 08/01/2021. Press notices were posted on 13/01/2021 and 20/01/2021 and a site notice posted on 25/01/2021.
- 5.3 925 representations have been received from individuals, of which 924 object to the proposals and 1 supporting the proposals. Furthermore, 19 objections have been received but with no clear or readable name or address. The comments received are summarised below with an officer response at the end of the summary:

Objection	Response
<p>Loss of Local Open Space and associated impacts environmental and health benefits.</p> <p>Developing on green field land shouldn't be allowed.</p>	<p>The partial loss of Local Open Space is considered acceptable when considered in the round with the public benefits of the application. A full assessment is given in paragraphs 7.2-7.40.</p>
<p>Loss of allotments with the re-provision being a lower quantity and quality and where there is an increased demand for allotments.</p>	<p>The partial loss of allotments is considered acceptable when considered in the round with the public benefits of the application.</p>

	A full assessment is given in paragraphs 7.2-7.40.
Manipulating the vacancies of the allotments.	The vacancy rates of the existing allotments has been taken into consideration when assessing this application. A full assessment is given in paragraphs 7.2-7.40.
Loss of a designated Asset of Community Value (ACV).	The partial loss of the ACV is considered acceptable when considered in the round with the public benefits of the application. A full assessment is given in paragraphs 7.2-7.40.
The applicant should fund the repair works to Syon House and Syon Park through alternative means. These repairs have already been secured through a previous permission for the Hilton Hotel in the grounds of Syon Park.	A number of repair works have been secured and completed through the hotel development. The current application would help to expedite other repair works listed in the hotel development S106 legal agreement as well as additional repair works. A full assessment is given in paragraphs 7.106-7.118.
Loss of habitat and harm to biodiversity.	The proposal is considered acceptable in terms of biodiversity and would result in biodiversity gains and an Urban Greening Factor of 0.4 subject to relevant conditions being attached; a full assessment is given in paragraphs 7.265-7.284.
Loss of trees.	The proposed loss of 23 trees would not result in the loss of any Category A tree and the proposal incorporates 71 new trees. Therefore the loss of the existing trees are considered acceptable subject to conditions. A full assessment is given in paragraphs 7.285-7.289.

<p>Harm to the Isleworth Riverside Conservation Area (IRCA) and other heritage assets.</p>	<p>The proposal is considered to preserve the character and appearance of the IRCA and would not harm other heritage assets subject to conditions. A full assessment is given in paragraphs 7.84-7.105.</p>
<p>Poor levels of affordable housing.</p>	<p>The proposed level of affordable housing has been increased from 35% per home to 40% per home through negotiations and is considered acceptable subject to a S106 legal agreement. A full assessment is given in paragraphs 7.41-7.50.</p>
<p>Housing need has not been demonstrated: the recent Housing Development Test indicates Hounslow has delivered beyond expectations, 75% being the maximum pass, with Hounslow achieving 154%.</p> <p>The area will become over-populated.</p>	<p>There is a clear and identified need for new homes in London and in Hounslow specifically. The Council has also pledged to secure 5000 affordable homes over 4 years from 2018 to 2022. This is split between 3000 rented homes and 2000 intermediate homes. The proposed 80 homes is considered to be acceptable. A full assessment is given in paragraphs 7.41-7.50.</p>
<p>The site is not designated as a site allocation within the adopted or emerging Local Plan.</p>	<p>While a site not being specifically allocated for development within the Local Plan does not rule out any development in principle.</p>
<p>The proposal would result in flooding.</p>	<p>The proposal is considered acceptable by the Environment Agency and after amendments and subject to conditions the Lead Local Flood Authority is satisfied that the proposal is acceptable. A full assessment is given in paragraphs 7.251-7.264.</p>
<p>The proposal would result in an increase in</p>	<p>It is considered that the proposal would not have any unacceptable</p>

<p>noise and air pollution.</p>	<p>impact on the living conditions of any of the neighbouring properties or future residents regarding noise or air pollution subject to conditions. A full assessment is given in paragraphs 7.208-7.211 on noise and 7.244-7.247 on air pollution.</p>
<p>Harm to neighbours; daylight/sunlight, privacy and noise disturbance.</p>	<p>It is considered that the proposal would not have any unacceptable impact on the living conditions of any of the neighbouring properties. A full assessment is given in paragraphs 7.181-7.213.</p>
<p>Transport; increase in traffic and lack of car parking spaces.</p>	<p>The proposal is considered acceptable in terms of transport subject to conditions and a S106 legal agreement. A full assessment is given in paragraphs 7.214-7.243.</p>
<p>The construction of the development would harm the health and wellbeing of existing residents from noise and dust.</p>	<p>It is considered that the proposal would not have any unacceptable impact on the living conditions of any of the neighbouring properties during the construction of the development subject to conditions. A full assessment is given in paragraphs 7.242-7.243.</p>
<p>The development would be in conflict to the government's 'Green Agenda'.</p>	<p>The proposal is considered acceptable regarding biodiversity and urban greening as well as demonstrating a 78% reduction in CO2 emissions. A full assessment is given in paragraphs 7.265-7.284 on biodiversity, 7.285-7.289 on trees and 7.125-7.133 on CO2 reductions.</p>
<p>The public consultation period should be extended into the summer due to the restrictions imposed by the lockdown.</p>	<p>Comments can be accepted up until the day of the planning committee and the application has been live for a significant</p>

	period, including through the summer enabling sufficient time for public consultation.
Support	
The proposal would remove the derelict allotments, which contains debris and rubbish as well as enabling anti-social behaviour after dark. The allotments are a playground for a small number of people and offers nothing to the masses.	
The proposal would provide housing, including affordable housing.	

5.4 A combined objection from Councillors Salman Shaheen, Sue Sampson and Daanish Saeed (all Isleworth Ward Councillors) has been received on 06/04/2021, which is summarised below:

- The proposal would involve the loss of designated Local Open Space that is also designated an Asset of Community Value. There continues to be no demonstration of a 'planning case for this loss'.
- The proposal incorporates 35.3% of affordable housing, and while this is a significant improvement on the previously refused application, it is still below the Local Plan requirement of 40%.
- The proposal is contrary to Hounslow Council's Allotment Strategy 2020-2025. All evidence suggests we need more allotment space in the Borough, not less.
- The proposal would have a harmful impact on Isleworth's Context and Character and Heritage, specifically of the Isleworth Riverside Conservation Area.
- The proposal would see mature trees being removed which are of high amenity value.
- Biodiversity would be impacted. No invertebrate survey was carried out. Compensation and mitigation would not recreate this haven.
- The Council has a duty to consider the effect of the development proposals on health, social and cultural wellbeing. The allotments provide for a year-round healthy lifestyle not only through exercise but also encourage good mental health; this has been especially valuable during the COVID-19 pandemic.
- Other income streams could, and should, be explored to address the need to repair Syon House and Syon Park.

Local action and amenity groups representations have been summarised below:

5.5 Park Road Allotment Association - Objection

- Allotment holders have only been offered a rolling 3 month lease. This has meant no security of tenure and therefore allotment holders giving up their leases
- The estate has not allowed any vacant plots to be re-let, despite numerous requests from the Park Road Allotment Association. The Association offered to manage re-letting plots, as there is no shortage of demand, but this offer was refused
- The Allotment Site Analysis survey conducted by the applicant is not representative of the true usage or demand
- Lack of true and meaningful consultation either prior to the submission of the application or throughout the process of the application
- Closure of the site does not remove the Local Open Space designation or allow for development and the proposal would not provide equivalent or better provision in a suitable location
- Less than 31 possible usable smaller allotment plots are proposed against existing 37 larger conventional sized plots on a 62% reduced sized site at a time of allotment waiting lists lengthening and demand growing for plots; this is insufficient for current users' requirements with no provision for additional or future demand
- Some plots will be less usable from over-shadowing of tree canopies
- Impacts upon drainage
- Concern over the use of herbicidal weedkiller
- Lack of measures to protect existing fruit trees
- The tree report is misleading due to including a number of trees incorrectly as tree groupings
- The proposed 30 year allotment provision is not a sufficient guarantee of longevity
- The applicant should have made the proposed improvements to the allotments when the applicant first took over management of the allotments
- The affordable housing wouldn't meet the NPPG definition of affordable housing due to the maintenance requirements
- Hounslow's Local Plan Review Site Allocation includes the provision of 250 homes within the hospital site itself. Why would the hospital need more?
- The site is not designated under the Council's Site Allocation for development and fails to provide 50% affordable as outlined in the 2021 London Plan

- The proposal would result in a loss in biodiversity and urban greening

5.6 The Isleworth Society - Objection

- Loss of Local Open Space
- Loss of allotments
- Loss of a community use, which is designated as an Asset of Community Value (ACV)
- The site is not designated for housing in Hounslow's Local Plan
- The proposal would result in a loss in biodiversity and urban greening
- The proposal would harm the conservation area
- The loss of the open green area would harm the health and wellbeing of allotment holders and wider community
- The proposal would result in the loss of a significant number of trees

5.7 Brentford Voice - Objection

- Loss of Local Open Space
- The proposal would harm the conservation area
- Loss of a community use, which is designated as an ACV
- Loss of allotments, which is not surplus to requirements
- The Transport Assessment is inadequate in its failure to account for the impact of increased vehicle movement upon the character of Syon Park
- The proposal would result in a loss in biodiversity and urban greening
- The level of provision of affordable housing is unacceptably low
- It is fundamentally wrong, in principle, to permit development on a site where the objective is to secure funding to maintain another site
- We are not convinced that alternative funding sources do not, or could not be, made available
- A Development Plan or Masterplan, in the public domain, is required for Northumberland Estates' holdings in Syon Park, Syon House, and other properties in the vicinity

5.8 Brentford Community Council - Objection

- The proposal would result in the loss of two thirds of a valued Local Open Space
- The proposed level of allotments would be clearly insufficient to meet local demand
- It is fundamentally wrong to propose development solely to secure funding to maintain another site, especially if the revenue stream proves inadequate
- The four storey terrace housing proposed is unsuitable for this site

5.9 The Countryside Charity - Objection

- Loss of Local Open Space
- Loss of allotments and does not meet current plot holder requirements or enable future or additional lettings
- Loss of a community use
- The loss of the open green area would harm the health and wellbeing of allotment holders and wider community
- The proposal would result in a loss in biodiversity and urban greening
- The proposal would harm the conservation area
- The proposal would result in the loss of a significant number of trees
- The recent Housing Development Test indicates Hounslow has delivered beyond expectations, 75% being the maximum pass, with Hounslow achieving 154%
- As an 'enabling' development, the proposal to sacrifice one important asset (allotments) to support repair and maintenance of another (Syon House) should not be supported
- There are other options for creating a sustainable financial model for Syon House, not least developing it as an attractive visitor destination with expanses of green space
- It is not clear that the development will enable maintenance and repair of Syon House
- The site is not designated for housing in Hounslow's Local Plan

5.10 The Gardens Trust - Objection

- The site is not designated for housing in Hounslow's Local Plan
- Loss of Local Open Space, which is even more important following the Covid-19 impacts and restrictions including mental health
- Loss of allotments
- The size of the proposed allotments would be much smaller than the existing allotments
- A number of the proposed allotments would be overshadowed by trees
- The applicant's claims that many of the plots within the current allotments are vacant or uncultivated is disingenuous
- The proposal would harm the conservation area
- Hounslow is able to demonstrate a 10-year supply of deliverable housing, so the proposal is superfluous to requirements
- The proposal, even if filtered by trees to some degree, would negatively affect the significance of Syon Park (Grade I registered park) and its Grade II perimeter wall as well as the Grade II* listed All Saints Church

- The physical separation between the affordable element of the proposal and the private rent element would result in discrimination

5.11 Isleworth Ait Management Group - Objection

- The proposal would result in a loss in biodiversity and urban greening and would destroy the wildlife corridor
- There has been an increase in people valuing the outdoor environment, gardening and wildlife particularly during the pandemic
- The proposal would harm the conservation area

5.12 National Allotment Society - Objection

- The proposal would result in the permanent loss of 80% for the allotment land and does not address the shortfall
- The proposed loss would impact on the availability of allotments and allotment land within the London Borough of Hounslow and its duty to provide under the Allotments Acts 1908-1950
- Hounslow's Allotment Strategy states that the "current demand vastly exceeds the vacant plots" for allotments
- The significant reduction in allotment sizes do not meet the needs of existing allotment holders
- The ongoing planning applications have resulted in the site being less cultivated before a proposed re-development
- Poor level of information on existing and/or future allotment leases
- The proposal would not enhance the ACV designation
- The proposed biodiversity enhancements could be incorporated within the existing site
- The proposal would result in a loss in biodiversity and urban greening

5.13 Chiswick Horticultural and Allotments Society - Objection

- The development of open land around Brentford (or any other densely populated area) is reprehensible and deplorable
- The site is a valuable resource for good healthy living and the maintenance of long-held community well being
- Land once lost to building can never be restored
- This development will not help the homeless, whence comes disorder and despair

5.14 Capital Growth (charity) - Objection

- The allotments have a role to play for wellbeing, connecting communities and increasing biodiversity in the local area
- Loss of Local Open Space
- Loss of allotments, which are in high demand

- The proposal would result in a loss in biodiversity and urban greening and trees

5.15 The Old Isleworth Four Roads Residents' Association - Objection

- Loss of Local Open Space
- Loss of a community use, which is designated as an ACV
- The proposal would harm the conservation area
- The proposal fails to comply with several policies within Hounslow's Local Plan and is not designated for housing
- The previous public inquiry was dismissed for the Loss of open Space

5.16 Osterley and Wyke Green Residents Association - Objection

- Loss of Local Open Space, which is even more important following the Covid-19 impacts and restrictions
- Loss of allotments
- Loss of a community use, which is designated as an ACV
- Loss of biodiversity and urban greening
- There is a big demand for more open space in Brentford and Syon area
- The site is not designated for housing in Hounslow's Local Plan
- The design of the buildings are acceptable but their height and massing would harm the conservation area and the Grade II* listed church

5.17 Spring Grove Residents' Association - Objection

- Loss of Local Open Space, which is even more important following the Covid-19 impacts and restrictions
- Loss of allotments with no certainty of continuing longer term
- Loss of a community use, which is designated as an ACV
- The proposal would harm the conservation area, and is and contrary to Hounslow's Spatial Strategy (part of Hounslow's Local Plan 2015 – 2030).
- The site is not designated for housing in Hounslow's Local Plan
- Loss of biodiversity and urban greening

5.18 Friends of Northcote Nature Reserve - Objection

- Loss of Local Open Space, which the planning inspector concluded in the previous public inquiry
- Loss of allotments with no certainty of continuing longer term
- Loss of a community use, which is designated as an ACV

- The proposal would harm the conservation area, and is and contrary to Hounslow's Spatial Strategy (part of Hounslow's Local Plan 2015 – 2030).
- Open spaces, parks and allotments promote and maintain physical, mental and social well-being, especially following the Covid-19 impacts and restrictions
- Loss of biodiversity and urban greening
- The site is not designated for housing in Hounslow's Local Plan

5.19 All Saints Church - Response

- The proposals should maintain vehicular access to the church access road, car park and garages
- The applicant should provide improvement works to the access road and the car park of the church
- The boundary walls require repair works
- The Construction Method and Logistics Plan should ensure that people can easily and safely access the church during the construction phase
- The proposal should not harm the biodiversity of the adjoining churchyard, which has been awarded the Green Flag award.

Statutory consultees

5.20 Environment Agency

- No objections subject to a recommended informative regarding flood emergency response procedures.

5.21 Chelsea and Westminster Hospital NHS Foundation Trust

- The Trust supports the application as it incorporates 30 homes for key worker NHS hospital staff that would be provided on a lease of 30 years. There is a need for good quality residential accommodation in close proximity to the hospital. The Trust would be acceptable for the key worker housing being secured within a S106 legal agreement.
- Fit for purpose housing is in short supply, particularly where apartments can be shared by staff wanting to rent property. The Trust needs to be able to offer flexibility and by committing to a lease of 30 years for 30 homes the Trust would be better placed to offer shorter tenancies where necessary and also attract and retain NHS staff at the hospital.
- Transport costs and journey times are also a major issue for our key worker staff and the proximity of the development to the hospital would be a considerable benefit, especially for shift workers, where a better quality of environment can be offered.
- The provision of affordable housing is supported by the Trust.

5.22 Historic England - Greater London Archaeological Advisory Service (GLAAS)

- No objection subject to a condition and an informative regarding a Written scheme of investigation.

5.23 Heathrow Safeguarding

- No objection subject to informatives regarding the use of cranes during construction.

5.24 National Air Traffic Service (NATS) Safeguarding

- No objection.

5.25 London Fire Brigade

- The Commissioner is satisfied with the proposals subject to the buildings being designed and constructed to provide access and facilities for the fire service as per the requirement in Approved document part B5.

5.26 Thames Water:

- No objections raised subject to recommended conditions and informatives regarding piling, surface water drainage, oil interceptors, public sewers and water pressure.

5.27 National Grid (Cadent Gas Ltd):

- High or Intermediate pressure (above 2 bar) Gas Pipelines and associated equipment is located in the vicinity of the site. However, the proposal would not affect the pipelines and therefore no objections are raised.

5.28 Design out Crime Officer

- The Design Out Crime Officer is satisfied that the development could achieve the Silver Award accreditation of the Secured by Design New Homes 2019 after amendments were made regarding the basement layout and subject to a condition (25) regarding meeting the 'Secured by Design' accreditation.

6.0 POLICY

Determining applications for full or outline planning permission

- 6.1 The determination must be made in accordance with the development plan unless material considerations indicate otherwise. Local finance considerations must also be assessed.

The National Planning Policy Framework

- 6.2 The National Planning Policy Framework (NPPF) was revised on 20 July 2021. The National Planning Practice Guidance (NPPG) has also been revised on 24

June 2021 and is an online guidance resource that supports the NPPF. Where pertinent, the NPPF and NPPG are material considerations that will be taken into account in decision-making.

The Development Plan

6.3 The Development Plan for the Borough comprises the Council's Local Plan (2015), the West London Waste Plan (2015) and the London Plan (2021).

6.4 The Council are currently undertaking two Local Plan Reviews; the West of Borough Local Plan review, the Great West Corridor Local Plan review and the Site Allocations Local Plan review. These plans have been submitted to the Secretary of State for examination; however their policies are afforded little weight at this stage. The Local Plan documents can be viewed on the Planning Policy pages of the Hounslow website.

6.5 London Plan (2021) - relevant policies

- GG1 Building strong and inclusive communities
- GG2 Making the best use of the land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agent of change
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing mix size
- H11 Build to Rent

- S4 Play and informal recreation
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth
- HC2 World Heritage Sites
- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- G8 Food growing
- S11 Improving air quality
- S12 Minimising greenhouse gas emissions
- S13 Energy infrastructure
- S14 Managing heat risk
- S15 Water infrastructure
- S17 Reducing waste and supporting the circular economy
- S112 Flood risk management
- S113 Sustainable drainage
- T2 Healthy Streets
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning

6.6 Mayor of London's Supplementary Planning Guidance (SPG's):

- Affordable Housing & Viability (2017)
- Housing (2016)
- Accessible London: Achieving an Inclusive Environment (2014)
- Play and informal recreation (2012)
- Homes For Londoners: Affordable Housing And Viability (2017)
- Character and Context (2014)
- The Control Of Dust And Emissions During Construction And Demolition (2014)
- Crossrail Funding (2016)

6.7 Local Plan (2015) - relevant policies

- ED4 Enhancing local skills
- SC1 Housing Growth
- SC2 Maximising the provision of affordable housing
- SC3 Meeting the need for a mix of housing size and type
- SC4 Scale and density of new housing development
- SC5 Ensuring suitable internal and external space
- CC1 Context and character
- CC2 Urban design and architecture
- CC4 Heritage
- GB2 Open space
- GB4 The Green Infrastructure Network
- GB7 Biodiversity
- GB8 Allotments, agriculture and local food growing
- CI1 Providing and protecting community facilities
- EQ1 Energy and carbon reduction
- EQ2 Sustainable design and construction
- EQ3 Flood Risk and surface water management
- EQ4 Air quality
- EQ5 Noise
- EQ6 Lighting
- EQ7 Sustainable waste management
- EQ8 Contamination
- EC2 Developing a sustainable local transport network

6.8 Hounslow's Supplementary Planning Documents (SPD's):

- Air Quality (2008)
- Recycling and Refuse Guidance (2019)
- Planning Obligations and CIL (2015)

6.9 Other material planning documents:

- Hounslow's Draft Open Space Study (2018)
- Hounslow's Allotments Strategy 2020-2025

7.0 PLANNING ISSUES

7.1 The planning issues to consider are:

- Principle of development
- Housing
- Design and appearance
- Heritage
- Sustainability
- Quality of accommodation for future occupiers
- Fire safety
- Impact on adjoining occupiers
- Highways issues
- Environmental considerations
- Trees
- Waste management
- Health impacts
- Planning obligations

Principle of Development

7.2 The National Planning Policy Framework (NPPF, 2021) sets out the planning policy guidance from central government to be used by all local authorities in England when preparing development plans. A key principle underpinning the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

7.3 The two previous connected appeal decisions at the site and at Syon Park (Ref's: 00707/E/P110 and 00707/E/P111) that were both dismissed at a Public Inquiry (with a decision date of 29/11/2018) are material considerations in the assessment of the current planning application.

Policy overview

7.4 The site currently comprises 37 non-statutory allotments managed by Northumberland Estates, is designated as Local Open Space and is also an Asset of Community Value (Ref: ACV-016), which was renewed in October 2020 for a period of five years. The site is not allocated within the adopted Local Plan (2015) or the Site Allocations Local Plan Review. Therefore, the general policies of the Development Plan apply, where the NPPF is a material planning consideration.

7.5 The NPPF establishes a presumption in favour of sustainable development and seeks opportunities to deliver net gains across each of the three objectives of

sustainable development; economic, social and environmental (paragraphs 8 and 11).

- 7.6 The NPPF paragraph 98 states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.
- 7.7 NPPF paragraph 99 states that existing open space and recreational buildings and land should not be built on unless:
- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 7.8 The NPPF (pages 65 and 71) confirms within its glossary that allotments are not assessed as brownfield land or previously developed land.
- 7.9 NPPF paragraph 92 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which, amongst others, enable and support healthy lifestyles through the provision of allotments.
- 7.10 NPPF paragraph 93 states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should, amongst others:
- plan positively for the provision and use of shared spaces, community facilities (such as open space) and other local services to enhance the sustainability of communities and residential environments;
 - take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; and
 - guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.
- 7.11 NPPF paragraph 120 states that, amongst others, decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains but should also recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.

7.12 London Plan (2021) policy GG2 states that those involved in planning and development must (amongst others):

- enable the development of brownfield land, particularly on surplus public sector land and sites within and on the edge of town centres;
- prioritise sites which are well-connected by existing or planned public transport;
- proactively explore the potential to intensify the use of land to support additional homes and promoting higher density development;
- applying a design-led approach to determine the optimum development capacity of sites; and
- protect and enhance London's open spaces, including local open spaces.

7.13 London Plan policy GG3 states that those in planning must assess the potential impacts of proposals on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts and to maximise potential positive impacts.

7.14 London Plan policy G1 states that London's network of green and open spaces, and green features in the built environment, should be protected and enhanced.

7.15 London Plan policy G4 states that development proposals should not result in the loss of protected open space and where possible create areas of publicly accessible open space, particularly in areas of deficiency.

7.16 Local Plan (2015) policy GB2 states that the Council will protect and enhance Local Open Space. The Council will achieve this by:

- Designating and protecting Local Open Space as shown on the Policies Map, in line with the NPPF and the London Plan;
- Protecting and enhancing Local Open Space, addressing deficiencies in quality, quantity and access;
- Maintaining the supply of Local Open Space to meet the needs of the borough's growing population, by expecting on-site provision of publicly accessible open space, particularly in major new developments in areas of deficiency.
- Encouraging the provision of an appropriate balance and mix of open space types specific to meet needs in different parts of the Borough, with specific reference to increasing the provision of parks and gardens;
- Protecting quiet and tranquil areas of Local Open Space that are relatively undisturbed by noise and are valued for their recreation amenity attributes; and

- Working with partners, friends groups, other stakeholders and the general public to improve and enhance the quality of an access to Local Open Space.

7.17 The policy continues by stating that the Council will expect proposals to:

- Protect existing Local Open Space from development, especially where it would lead to a deficient in publicly accessible open space, unless it satisfies the criteria for such development in the NPPF in that: it has been assessed as clearly surplus to requirements; or it would be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreational provision, the need for which clearly outweighs the loss;
- Avoid the loss of or encroachment upon Local Open Space, or intrusion into an open aspect. Development ancillary to the open space use must preserve its predominantly open character; and
- Enhance the provision of publicly accessible Local Open Space in the Borough, especially in areas of open space deficiency as identified on an annual basis through Annual Monitoring Reports. Major developments should achieve this through onsite provision wherever possible, particularly in areas of substantial change and intensification.

7.18 London Plan policy G8 states that boroughs should protect existing allotments and encourage provision of space for urban agriculture, including community gardening.

7.19 Local Plan policy GB8 states that the Council will encourage the continued use of allotments and agricultural land. The Council will achieve this by:

- Retaining the existing allotments and resisting their loss unless in accordance with the borough's Allotment Strategy; and
- Protecting agricultural land;

7.20 The policy continues by stating that the Council will expect proposals to:

- Be consistent with and positively contribute to the open space and/or nature conservation designation of the land;
- Retain allotments and the best and most versatile agricultural land, unless it can be demonstrated that they are no longer required or viable for such purposes. In the event that such land is no longer required, the feasibility of appropriate alternative open space uses which allow the site to maintain its value for growing food such as community gardens or orchards, should be considered first.

7.21 Hounslow's Allotments Strategy 2020-2025 (HAS) states that the Council will continue to promote and enhance allotments by facilitating partnerships with public, private and voluntary sectors to make a valuable contribution to the borough's sustainability and community offering.

Assessment

- 7.22 The Council's Draft Open Space Strategy (OSS, 2018) identifies (para. 3.4.2) that there is generally a good level of quality across all open space sites within the Borough, which is reflected in nearly three quarters (73%) of sites scoring above their set threshold for quality. For clarity, quality is assessed against a number of criteria based on the space's functionality (see paragraph 7.33 for a list of the criteria).
- 7.23 The OSS also identifies that nearly all open space sites are assessed as being above the threshold for value, reflecting the role and importance of open space provision to local communities and environments (a high value site is considered to be one that is well used by the local community, including a wide range of benefits that the open space offers to the community (see paragraph 7.34 for a list of the criteria).
- 7.24 The OSS identifies that the Isleworth and Brentford Area (which the site is located within) achieves above the recommended standards in three of the four main types of open space, exceeding in parks and gardens, natural and semi natural spaces, and amenity greenspace. The Isleworth and Brentford Area does have a shortfall in the fourth main type of open space, which is allotments.
- 7.25 Therefore, there is no deficiency for overall open space or public open space in this area of Hounslow. Furthermore, Syon Park is opposite the site that provides a very significant amenity for the local community – Syon Park covers 83ha and has a quality score of 71.7% and a value score of 57.1% identified in the OSS. However, Syon Park is a different typology of open space (parks and gardens) compared to the current site in question (allotments) and also has restricted access times as well as having an entry fee to some parts of the site.
- 7.26 While there may be no deficiency of overall open space in the Isleworth and Brentford Area, there is a clear demand for allotments as identified in the OSS (page 60) with a waiting list of 141 (as of August 2021) for the statutory allotments combined and excluding the site. The Borough as a whole has a waiting list of 1241 as of August 2021 and has a current provision of 0.21 hectares per 1,000 population, which is below the National Society of Allotment and Leisure Gardeners (NSALG) recommended amount of 0.25 hectares per 1000 people.
- 7.27 Additionally, while there are vacant plots at the site, the Inspector found in the previously dismissed application at the Public Inquiry "that such a situation is likely to have come about because of the short duration of the new licenses granted to the incumbent plot holders and simply because of the uncertainty surrounding the site's future arising from this development proposal as acknowledged by the appellant. Both these factors would have made prospective plot holders think twice, especially if, as I heard at the Inquiry, there is no certainty that they can count on harvesting the efforts of their labours." Therefore, the vacancy rates at the site should be afforded reduced weight in the assessment of the site and the demand for this type of open space in the Isleworth and Brentford Area is still merited.

- 7.28 The designated LOS at the site is not open to all members of the public and therefore cannot be considered fully publicly accessible. However, as noted by the Inspector, the “ACV judgement concluded that it is not just allotment holders who can access the current allotments but all their families and friends and that the allotments further the social well-being of the wider community.” Therefore, the LOS can be considered a form of publicly accessible open space, albeit not fully accessible.
- 7.29 On this basis, the proposal would result in the partial loss of publicly accessible open space, resulting in a reduction in allotment land by 8319sq.m, which equates to a reduction of 74% of the site as a whole.
- 7.30 As identified above, the NPPF, the London Plan and the Local Plan all include policies that state that the loss of protected open spaces must be resisted unless equivalent or better quality provision is made in the local catchment area, and that replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.
- 7.31 The proposal would result in re-providing 38 allotment plots (referred from now on as ‘plots’), which reflects the number of existing plots on site. Where plots are not suitable for cultivation due to shading or existing trees, it is proposed to provide 4 additional ‘wild plots’ that would be used for amenity space, wildlife and playable landscape. Existing fruit trees will be transplanted (where possible) to the allotment holders’ new plots, proposed in response to feedback from allotment holders. The proposed 38 plots would have approximate areas of 60sq.m, which equates to a quarter of the size of a standard British plot (250sq.m). The average plot size in Hounslow is 200sq.m. The applicant suggests that the sizes of the proposed plots responds to a change in demand over recent years for smaller more manageable plots, which is true in part. The HAS identifies that a larger plot size can be a barrier to those who are looking to take on an allotment as a new interest. Council allotment officers have confirmed that the preferred size of a plot is 125sq.m but a 60sq.m are usable and appropriate as a starter plot for beginners. The applicant also states that the size of the plots have followed from engagement with existing allotment holders. However, this is anecdotal and the Park Road Allotment Association has objected including on the grounds that the reduced number and size of plots are insufficient for current users’ requirements with no provision for additional or future demand.
- 7.32 Therefore, the sizes of the proposed allotments would not fully mitigate current demands, which are recognised as too small for experienced allotments holders and would therefore not meet the needs of the existing allotment holders. Additionally, the number (only re-providing for the existing allotment holders) would not address additional or future demands if new allotment holders were to come forward. Overall, the proposed allotments would be insufficient regarding current and future demands for the Isleworth and Brentford Area in terms of allotments.
- 7.33 The OSS identifies that the Park Road Allotments (the site) has a quality score (the criteria for scoring quality includes: physical access (including accessibility and public transport); personal security; parking; information signage; equipment

and facilities; management; maintenance) of 57.6% where the threshold score that identifies allotments have a high quality score is 50%.

- 7.34 The OSS identifies that the Park Road Allotments (the site) has a value score (the criteria for scoring value includes: level of use; context of site; landscape benefits; ecological benefits; educational benefits; social inclusion and health benefits; cultural and heritage benefits; amenity benefits; economic benefits) of 25% where the threshold score that identifies allotments have a high value score is 20%.
- 7.35 Both the quality and value scores exceed the applied thresholds set out in the OSS for the allotment category of open spaces. The Isleworth and Brentford Area, and the Borough as a whole, also both largely exceed the quality and value thresholds for the allotment category of open spaces. This demonstrates that in the immediate locality, as well as the wider Borough, the value of allotments is widely recognised due to the associated social inclusion, health benefits and the sense of place they offer, with high level of latent demand.
- 7.36 The site currently contains a number of sheds associated with the allotment use. However, not all allotments benefit from a private shed and some of the existing sheds are in poor condition. There are also limited communal facilities such as toilets, a community room or sufficient or well managed compost bins.
- 7.37 The proposal incorporates private sheds for all plots and a single storey building that would provide community facility (22sq.m) with electricity and a communal storage area. Compost areas and rainwater butts would also be provided. A children's playspace is also proposed. These introductions to the allotments are considered improvements to the existing arrangement and are welcomed and would be secured through a combination of recommended conditions (11) and planning obligations in a S106 legal agreement.
- 7.38 The applicant has confirmed that the allotments would be safeguarded for a minimum period of 50 years (an increase from an initial proposed 30 years at the start of the application) and would be managed by Northumberland Estates in line with an Allotment Management Plan, with both being secured through a S106 legal agreement.
- 7.39 While the proposal would retain a similar number of allotments and would introduce improved facilities and safeguarding their use for 50 years, overall, there would still be a loss of publicly accessible open space in the form of non-statutory allotments where the proposed offer does not demonstrate an equivalent or better quality provision than what currently exists.
- 7.40 Notwithstanding this, the loss of the LOS needs to be balanced against other planning benefits arising from this development as set out below.

Housing

Affordable Housing

- 7.41 The NPPF and the London Plan encourage new residential developments to provide a choice of housing with a mix of family and non-family housing needed to meet different community requirements.
- 7.42 London Plan policy H4 relates to affordable housing and states that the strategic target is for 50% of all new homes to be genuinely affordable. The proposal includes more than 10 homes and so triggers affordable housing requirements. The policy also states that affordable housing should be provided on site and that affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances. London Plan policy H5 states that the threshold level of affordable housing on gross residential development is initially set at a minimum of 35%.
- 7.43 London Plan policy H6 relates to affordable housing tenure and emphasises the need to provide genuinely affordable homes. London Plan policy H11 identifies the criteria for Build to Rent (BtR) schemes.
- 7.44 Local Plan policy SC2 seeks to maximise the provision of affordable mixed tenure housing on sites with an appropriate mix of housing size and tenure in accordance with housing need.
- 7.45 The rent levels of affordable housing for a BtR scheme is preferred at London Living Rent (LLR) in line with London Plan policy H11.
- 7.46 The application proposes 80 new homes in the form of BtR. The proposal incorporates an affordable housing offer of 32 homes (40% per home). Through negotiations, the Council has secured 19 homes at 70% of GLA's open market rent levels and 13 homes at London Living Rent (LLR) with an affordable housing mix comprising 11 x 1-bedroom homes, 13 x 2-bedroom homes and 8 x 3-bedroom homes. The rent levels and mix would be secured through the S106 legal agreement.
- 7.47 The Council's current affordable housing position states that the Council will seek the maximum reasonable amount of affordable housing on site.
- 7.48 A full viability assessment has been submitted with the application and has been assessed by BPS, an independent viability consultant, who have reviewed the document and concluded that the proposal would be in £5,418,548 deficit and that the proposal is maximising the reasonable amount of affordable housing. In addition, both early and late stage review mechanisms would be secured through the S106 agreement.
- 7.49 It should also be noted that all proposed homes would be tenure blind in all aspects, including access to amenity areas, in elevation and their layout.
- 7.50 The proposal would therefore result in a positive contribution to the Borough's affordable housing targets and complies with the above policies, subject to the affordable housing being secured within a S106 agreement.

Housing Mix

- 7.51 London Plan policy H10 regards housing size mix and states that developments should generally consist of a range of home sizes considering housing need; the requirement to deliver mixed and inclusive neighbourhoods; the nature and location of the site and the aim to optimise housing potential on sites.
- 7.52 Local Plan policy SC3 sets out that developments are expected to provide a mix of new housing to meet the Council's general housing need and that the Council will use the most up to date evidence in order to inform the preferred mix of housing sizes.
- 7.53 The LBH Strategic Housing Market Assessment (SHMA, 2018) prepared by ORS underpins the current Local Plan Reviews and is the latest evidence of Council's housing need.
- 7.54 The proposal comprises a mix of studios, one, two and three bedroom homes.
- 7.55 The Local Plan defines family sized units to be two bedroom (four person) homes and above. For clarity, 1B2P represents the number of bedrooms and bed spaces.
- 7.56 The proposal would provide 64% family housing (2B4P and above) with the remainder being 1B2P/2B3P homes as well as one market rent studio. Overall, it is considered that the housing mix is acceptable and the affordable housing would meet the Council's current intermediate needs.

Accessible Housing

- 7.57 London Plan policy D7 regards accessible housing and requires developments to provide at least 10% of homes to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' with all other homes to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 7.58 The proposal incorporates 8 wheelchair user homes, which represents 10% of the proposed homes and comprises a mix of 5 x 1-bedroom homes and 3 x 2 bedroom homes. Whilst there is a presumption to locate wheelchair homes at ground floor level, site constraints (flood risk issues and passive house design) have resulted in 6 of the 8 wheelchair homes being located at first and second floor levels and this is considered acceptable in this instance, mainly due to the proposed DMR wheelchair homes on the first and second floor having lift access in close proximity to their entrances. Details of the wheelchair homes would be secured through the S106 legal agreement.
- 7.59 The submitted documents state that there are 7 on street parking spaces, 4 of these being blue badge spaces with a further provision of an additional 4 if demand dictates. However, these are not clearly identified on the proposed plans and therefore details of these would be required, clearly showing the accessible blue badge parking spaces available for the wheelchair units in Block G1 and G2. This would be secured within a recommended condition (18).

Conclusion

- 7.60 Overall, the proposed affordable housing offer is 40% which comprises Discount Market Rent including 19 homes being secured at London Living Rent. The majority of the 3-bedroom homes are within the affordable housing provision and a suitable housing mix would help to deliver mixed and inclusive neighbourhoods while also providing an acceptable level of wheelchair accessible homes.
- 7.61 Therefore, the proposal is considered to comply with the NPPF (2021), London Plan (2021) policies H4, H6, H10 and D7 and Local Plan (2015) policies SC2 and SC3.

Key Worker Housing

- 7.62 The applicant has been in discussions with West Middlesex University Hospital prior to and during the application and have agreed to incorporate key worker housing (30 homes) for the hospital. This provision would help to address the current shortfall of key worker housing in the area as identified by the hospital. Given the close proximity, the key worker accommodation would benefit key workers accessing the hospital easily, especially when on shift work.
- 7.63 The housing mix of the key worker homes comprises 3 x 1-bedroom homes, 24 x 2-bedroom homes and 3 x 3-bedroom homes, thereby incorporating a range of housing sizes and accommodating for a diverse group of key workers. The key worker homes would be located along Snowy Fielder Waye in Blocks A, B and C, which is the closest part of the site to the hospital.
- 7.64 The key worker housing is proposed to be on a long lease to the hospital, which would be secured within the S106 legal agreement.

Design and Appearance

- 7.65 NPPF paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.66 The NPPF paragraph 130 continues by stating that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- 7.67 NPPF paragraph 134 states that permission should be refused where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.

- 7.68 However, the NPPF continues by stating that significant weight should be given to development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or incorporates outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 7.69 London Plan policy D3 requires developments to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions and which are street-based with clearly defined public and private environments. The policy also requires developments, amongst others, to:
- Respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character;
 - Be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well;
 - Provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.
- 7.70 London Plan policy D4 is in regard to delivering good design and requires that Boroughs assess developments by the necessary officers and requires maximum design detail is submitted during the application stage, with appropriately worded conditions attached to any permission. The policy also suggests that the original design team are involved in the development through to completion via a condition.
- 7.71 Local Plan policies CC1 and CC2 state that the Council will recognise the context and varied character of the borough's places and seek to ensure that all new development conserves and takes opportunities to enhance their special qualities and heritage. They seek to retain, promote and support high quality urban design and architecture to create attractive, distinctive, and liveable places.
- 7.72 It should be noted that the current proposal is similar in some aspects when compared to the design and appearance of the previous scheme (Ref: 00707/E/P110) (which was not dismissed at appeal on design grounds) in terms of the building heights and layouts of some buildings as well as the inclusion of pitched roofs and dormers as well as material finishes. Furthermore, the current proposal would have a reduced footprint when compared to the previous

scheme (a reduction of approximately 1300sq.m) due to the current scheme retaining the southern section of the site as allotments.

- 7.73 While there are differences between the two schemes there are still a number of similarities including ones that the Inspector found to acceptable within the previous scheme stating that it was “well designed, taking its design cues from local buildings, has a good delineation between private and shared open space, would be well landscaped and would be built of high quality materials appropriate for the area”. This assessment from the Inspector is considered to be a material consideration for the current proposal.
- 7.74 The proposed buildings in the current application range between two and three storeys with further dormer roof accommodation in some locations creating a fourth storey with a maximum height of 14.3m. The distribution of heights across the site has been influenced by the character of neighbouring properties with taller elements towards the north and centre of the site, which would be closer to the taller building elements at Hepple Close and beyond this at West Middlesex Hospital. The heights would then step down towards the south to correspond with the existing properties on Snowy Fielder Way, which are two storey residential homes.
- 7.75 The proposal follows the curved geometry of Snowy Fielder Way and would create a legible street edge, providing passive surveillance and enclosure to this side of the street, strengthening the boundary and quality of landscaping along Snowy Fielder Way. Furthermore, the crescent avenue referred to as Church Walk would create a new east-west tree-lined route through the site, which seeks to extend the existing lime tree avenue to the church into the site. This would provide a visual connection and physical route to All Saints Church and the Thames Path to increase permeability and legibility within the local area. Access to the residents’ amenity areas, concierge and basement parking are provided here as well as visitor parking spaces, ensuring activity and animation in a shared surface setting.
- 7.76 While Block F would have a relatively substantial mass, it is considered that the proposal would maintain a leafy and verdant quality along Park Road with the proposed buildings set back sufficiently from the boundary with the highway and incorporating visually permeable boundary treatment and boundary planting in the form of retained and new trees and hedgerows.
- 7.77 To reduce the visual appearance of the buildings, gaps have been introduced between blocks to secure views of the landscaped gardens within the site. This design approach, in combination with the retention of the allotments in southern part of the site, also helps to retain an element of the existing open character of the area.
- 7.78 The buildings have been designed so there is a clear distinction between top (pitched roofs clad in bronze coloured metal rhomboid panelling bronze coloured cladding) and bottom (brick) parts. The architectural expression of the blocks has been carefully considered to use arches and dormer elements at roof level to define individual duplex homes whilst also reducing the visual appearance of the blocks, particularly when viewed from Snowy Fielder Way.

- 7.79 The proposed buildings would have their entrances fronting onto the street either directly when at ground level or from an open deck access at upper floor levels, which provides an active frontage and passive surveillance to the streets. The rears of the buildings house the more private elements of the homes, such as bedrooms and living rooms, which face onto either the quieter open communal amenity space that is available for all residents for the northern part of the site, or onto private gardens/balconies for the southern part of the site.
- 7.80 The proposed design utilises traditional materials and building forms, including masonry, pitched roofs, dormer windows and vertical window proportions, using an arrangement and detailing that is contemporary in appearance. The material palette of the architecture reflects the surrounding context using brick, dark metalwork and textured roofing, which would be secured through a recommended condition (12).
- 7.81 The proposed landscaping would ensure that the site has an open and green aspect. Whilst existing trees would be removed to facilitate the development, these have been limited to those necessary (a total of 22 individual trees and 10 groups of trees) and substantial additional planting (including 71 new trees) is proposed. The final and full details of the landscaping, soft and hard, is key to ensuring that a high quality finish is achieved, and to realise the landscaped scheme design. This would be secured through a recommended condition (16).
- 7.82 The proposed allotments and associated structures and facilities would retain part of the existing open and agricultural character and a condition is recommended requiring details of the layout of the community building to ensure a high quality design and that they are suitably maintained (11).
- 7.83 Overall, the scale, massing, design and appearance of the proposal is considered acceptable with the quality being secured through recommended conditions, for elements such as materials, detailed drawings and landscaping.

Heritage

General heritage

- 7.84 The NPPF (paragraph 189) recognises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. When determining planning applications, local planning authorities (LPAs) should require applicants to describe the significance of any heritage assets affected. The level of detail should be proportionate to the asset's importance (paragraph 194).
- 7.85 NPPF paragraph 195 states that LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. LPA's should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

- 7.86 The NPPF (paragraph 199) continues by stating that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 7.87 The NPPF (paragraph 199) states that LPAs should look for opportunities for new development within conservation areas (a CA) and within the setting of heritage assets, to enhance or better reveal their significance.
- 7.88 London Plan policy HC1 states that developments affecting heritage assets and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The policy also states that developments should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.
- 7.89 Local Plan Policy CC4 states that development will be expected to conserve and take opportunities to enhance any heritage asset and its setting in a manner appropriate to its significance. It continues that the Council will preserve and enhance the character or appearance of existing CAs by ensuring that any development within or affecting them preserves or enhances their character and appearance. Development should respect the character of the existing architecture in scale, design and materials, and take account of relevant conservation area guidelines.
- 7.90 A Heritage, Townscape and Visual Impact Assessment (HTVIA) and a Historic Environment Assessment (HEA) were submitted in support of this application.
- 7.91 The HTVIA considers the potential impacts of the proposal on local townscape and visual amenity, as well as the effects on the setting of heritage assets in the area. The HTVIA concludes that the existing allotments do not contribute to the historic value of the Isleworth Riverside Conservation Area (IRCA), and no historic value would be lost through their redevelopment. This assessment was shared with the Inspector for the previous scheme that was not dismissed on heritage reasons. The Inspector found that the site does not perform a key open space that helps separate Old Isleworth from the twentieth century suburban development to the north as "there is twentieth century suburban development in Snowy Fielder Way and Hepple Close and views from and over the site from the south are dominated by the hospital buildings".
- 7.92 The redevelopment of the site would, however, change the character of the IRCA immediately around Snowy Fielder Way, Park Road and around the churchyard to the All Saints' Church. While the proposal would result in additional massing along Park Road when compared to the previous scheme, the proposal would maintain similar heights, retain substantial gaps between the proposed buildings and incorporates metal railings, which would enable a high level of openness to exist.
- 7.93 Additionally, the current proposal incorporates allotments in the southern section of the site, which would help to retain a level of the existing open character the

site currently displays and is a marked improvement from the previous scheme, which incorporated a number of two to three storey buildings in the southern section of the site.

- 7.94 While the existing soft landscaping (including a number of trees) and some allotment infrastructure would be partially lost, the proposal would result in a series of well designed residential blocks, in a soft landscaped setting with replacement trees. The proposal is of a comparable scale and height to the domestic properties that characterise the IRCA, and it maintains the existing townscape hierarchy which is crowned by the Church, both as the tallest building and the most clearly visible within its own space.
- 7.95 The proposed design features and detailing as well as the material finishes would be characteristic of the IRCA but implemented in a contemporary fashion in order to avoid creating a pastiche and this approach is considered acceptable.
- 7.96 The Inspector only found one significant impact of the previous scheme on the character and appearance of the IRCA, which specifically regarded one proposed building blocking a glimpsed view of the Church tower from the junction of Park Road and Snowy Fielder Way. The current scheme has been designed with this in mind and has demonstrated that this glimpsed view has been protected, which is welcomed.
- 7.97 Overall, it is considered that the proposal would preserve the character and appearance of the IRCA, subject to recommended conditions regarding detailed drawings and materials (12).
- 7.98 The Church is Grade II* listed and is among other listed buildings along this stretch of the riverside. Given the modest heights of the proposal and the listed buildings being located along the riverside on Church Street (barring the Church) as well as the substantial vegetation and distance between the site and these listed buildings, it is considered that the proposal would preserve their significance. In terms of the Church itself, the composition and landmark silhouette would not be harmed due to the modest heights of the proposed buildings, the separation distances and substantial vegetation between the site and the Church. The retention of allotments in the southern section of the site also helps to protect views from along Snowy Fielder Way to the Church and its tower. Additionally, the proposed link through the site, named Church Walk, would create new viewing opportunities of the Church from Snowy Fielder Way.
- 7.99 It should also be noted that the Inspector considered that “it is the rebuilt Church’s, including its unashamedly modernist twentieth century rebuilt addition to the tower, contribution to the Old Isleworth riverside that is most important, both as a listed building and in terms of its importance to the character and appearance of the IRCA. In other words it is the views of the Church including its tower from the riverside that define its significance and a key element of the CA”. It can be confirmed that the proposal would not be visible in views from the river, due to the screening effect of the trees within the churchyard and the modest height of the proposed buildings. Additionally, as part of the recommended landscaping condition (9), details of repair works to the churchyard boundary wall would be required.

- 7.100 Therefore, it is considered that the proposal would not harm the significance or setting the Grade II* listed Church.
- 7.101 The proposal would have no effect on the architectural or historic value of the Porter's lodge at the entrance to Syon Park. The new frontage to Park Road would not diminish the experience of arrival at the entrance to Syon Park, replacing the rather incoherent feel of the allotments in the wider setting of the lodge with a designed and landscaped street scene. The proposal would be screened from views of the Syon Park Pavilion seen from the River, and the effect on that listed building would be neutral. The historic and architectural value of the boundary wall to Syon Park would not be affected. The proposal would improve the aesthetic setting of the listed wall, lining Park Road with a frontage comprised of well designed gables interspersed with green spaces behind the existing and new street trees.
- 7.102 In terms of Syon Park itself, due to the modest scale of the proposal and the density of the existing tree cover just inside the western boundary of Syon Park, the proposal would not be visible from within it. The proposal would create a well-designed new frontage to Park Road, enhancing its approach and so improving its setting.
- 7.103 The effect on the Royal Botanic Gardens, Kew World Heritage Site would be neutral as the proposed development would be screened from views within the buffer zone.
- 7.104 In summary, the proposal would replace an existing open space of no historic importance with a well-designed contemporary residential scheme. The proposal has been composed with careful reference to the scale, massing architectural style and materials found across the IRCA, and would enhance its existing architectural character and appearance. Retention of a number of existing mature trees, along with the proposed allotments, green landscaping and boundary treatment would preserve the verdant character of the IRCA as experienced on Snowy Fielder Way and Park Road, and from within the All Saints Churchyard.
- 7.105 It is considered that the proposal would preserve the character and appearance of the IRCA, as well as preserving the settings of the surrounding listed buildings and other heritage assets.

Heritage restoration via financial contributions

- 7.106 The site, and Syon House (including Syon Park), which is in close proximity to the site, are both owned by the Duke of Northumberland through the Northumberland Estates (NE) and who are also the applicant of this application.
- 7.107 Syon House is Grade I listed and the park is included on Historic England's Register of Historic Parks and Gardens as Grade I. Both are important, national statutory designations. The cost of maintaining and repairing Syon House and its grounds is considerable. A number of important works need to be undertaken comprising the internal conservation and refurbishment of the state rooms and repairs to the stone façade, and the restoration of Lion Gate and its Lodges as well as other parts of the grounds including the ha ha wall. The NE's objective is

therefore to secure the long term funding for the ongoing maintenance, conservation and restoration of these heritage assets so that they can continue to remain as a unique example of a rural estate located in a major conurbation, to be enjoyed by future generations.

- 7.108 It should be noted that Enabling Development has already been secured through the permission (Ref: 00707/E/P93) of a 155 bedroom hotel in the grounds of Syon Park in 2004. This incorporated a number of restoration works to both Syon House and the wider Syon Park estate, which would be funded through the income generated from the hotel use. The repair works have a 25 year period to be completed within. A number of the restoration works listed within the previous permission (Ref: 00707/E/P93) have been carried out but there are still a number of listed works that have not been completed and form part of the proposed restoration works within this current application.
- 7.109 The current application does not incorporate any formal 'Enabling Development' unlike the previous application (Ref: 00707/E/P110) that was dismissed at appeal.
- 7.110 A number of the previous restoration works listed in the S106 legal agreement of the hotel development have either commenced or completed. These include parts of the ha ha boundary wall; stone work to the conservatory; remedial work to Lion Gate and Lodges; roof repairs to both to Syon House and the riding school. These works were confirmed to have been completed on 01/09/2021.
- 7.111 The current application would seek to fund repairs on a number of additional parts of Syon House and Syon Park on top of what is required from the hotel development as well as to provide additional funds for repair works that form part of the hotel development, which have not been completed, in order to expedite these restoration works and to prevent these elements falling into further disrepair.
- 7.112 To generate the funding necessary for these restoration works, NE are therefore proposing to build 80 homes on the current site. The residential development would comprise high quality rental housing, to be retained in the long-term ownership and management of NE. This would ensure a long-term income stream is generated, in combination with the existing hotel located within Syon Park, so it is able to fund a schedule of costly dilapidations, thereby ensuring the long-term sustainable future of this nationally significant heritage asset. These are important works which NE intends to undertake over a period of 20 years. This funding would be secured through a planning obligation within a S106 legal agreement.
- 7.113 NPPF paragraph 57 states that planning obligations must only be sought where they meet all of the following tests:
- a) Necessary to make the development acceptable in planning terms;
 - b) Directly related to the development; and
 - c) Fairly and reasonably related in scale and kind to the development.

- 7.114 The proposed funding for the restoration of Syon House and the wider Syon Park estate is considered to meet these three tests as identified below.
- 7.115 While the current application has not submitted for Enabling Works unlike the previous application, it is clear from the accounts that were submitted with the previous application demonstrating at the time that NE did not have surplus funds to support the required heritage works. NE has confirmed that this is still the case. The proposal would secure heritage benefits to Syon House and Syon Park, which carry significant weight in planning terms and is a material consideration in the planning balance to help outweigh the harm identified through the partial loss of Local Open Space and associated allotments. Therefore, it is considered that the heritage works to Syon House and Syon Park are necessary to make the development acceptable in planning terms.
- 7.116 The application site is not within the Syon Park grounds but is 13m from the boundary wall and is the same ownership of NE. The current application has been submitted on the sole basis that urgent heritage works are required to Syon House and Syon Park. Therefore, it is considered that the financial contributions that would enable the heritage works to be undertaken are directly related to the current application.
- 7.117 The financial contributions for the heritage works are considered to be fairly and reasonably related in scale and kind to the proposal. This is due to them being put forward by the applicant who has demonstrated that the heritage works are urgent and necessary and the quantum of proposed development would enable the correct level of ongoing revenue to support the heritage works in combination with the existing hotel.
- 7.118 Therefore, the heritage benefits that the proposal would secure would safeguard the preservation and enhancement of nationally important Grade I listed heritage assets over a 20 year period. This would be secured via a section 106 legal agreement. If these important works are not planned for and undertaken, the defects could deteriorate at an accelerated rate, which could result in more costly repairs. Moreover, there is a risk that if the works are not undertaken and the fabric of the house is left to deteriorate further, this could jeopardise public access currently afforded to the house.

Archaeology

- 7.119 The NPPF (Section 16) and London Plan policy HC1 emphasise that the conservation of archaeological interests are a material consideration in the planning process. Paragraph 194 of the NPPF states that applicants should submit desk-based assessments, and where appropriate, undertakes a field evaluation to describe the significance of the heritage asset and how they would be affected by a proposed development.
- 7.120 Local Plan policy CC4 states that the Council will identify, conserve and take opportunities to enhance the significance of the Borough's heritage assets as a positive means of supporting an area's distinctive character and sense of history. The Council expects developments to have regard to any harm to, or loss of, the significance of a non-designated heritage asset, including from both

direct and indirect effects. Non-designated heritage assets include locally listed buildings, Archaeological Priority Areas and areas of special local character.

- 7.121 The site is within an Archaeological Priority Area and therefore a Historic Environment Assessment (HEA) has been submitted with the application, which assesses the archaeological potential of the site and its significance. The HEA details that the site has a high potential to contain palaeoenvironmental remains as the site lies within the projected location of a palaeochannel and therefore would contain alluvium. Within the alluvium there is a high potential for insect, plant and mollusc remains that can be used to reconstruct past local environments. This would be of low or medium heritage significance depending on the type of the remains.
- 7.122 The report also details that the site has a moderate to high potential to contain archaeological remains dating to the prehistoric period. The site lies 30 metres to the east of a past archaeological investigation under Snowy Fielder Waye, which revealed a significant assemblage of Bronze Age and Iron Age artefacts, including an early Iron Age cremation. The significance of the remains would depend on their nature, extent and preservation, but could be of medium or high significance, derived from the evidential value of the remains. The potential for archaeological survival on the site is considered to be high in the absence of deep ground disturbances in the past and its current use as allotments.
- 7.123 The potential for archaeological remains from other periods is likely to be low given that historically the site has been open field land on the outskirts of the historic riverside village of Isleworth. Human remains are not anticipated to be present.
- 7.124 Historic England were consulted on 08/01/2021 but have not commented on this application. However, Historic England did assess the previous application (Ref: 00707/E/P110), which is similar in scale but slightly larger when compared to the current application. Historic England identified that “the site has the potential for evidence of prehistoric activity; however the remains are not of high enough significance to require preservation in situ. The impacts to the archaeological resource could be appropriately mitigated through the implementation of a programme of archaeological investigation in accordance with an archaeological condition”. Given that the current application would be smaller in scale and footprint, Historic England’s assessment for the previous application is applicable in this instance too. Therefore, subject to a recommended condition (3) requiring a programme of archaeological investigation, the proposal is considered acceptable regarding archaeology.

Sustainability

- 7.125 Sustainability underpins many London Plan and Local Plan policies. These require developments to be sustainable in transport terms, to minimise waste, include energy efficiency measures and promote use of renewable energy, and not significantly increase the requirement for water supply or surface water drainage.
- 7.126 London Plan policies SI2, SI4 and SI5 state that major development should be net zero-carbon and that all development should make the fullest contribution to

minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- Be lean: use less energy
- Be clean: supply energy efficiently
- Be green: use renewable energy
- Be seen: monitor, verify and report on energy performance

7.127 The above policies also require all major residential development to achieve a minimum 35% reduction in emissions on Building Regulations Part L compliant baseline (2013) with 10% achieved through energy efficient measures such as the design, layout and air permeability; where possible to achieve a carbon neutral standard; internal water use of 105L/person/day or less and incorporating sustainable material standards.

7.128 Local Plan policies EQ1 and EQ2 are also in regard to energy and carbon reduction as well as sustainable design and construction.

7.129 The application is accompanied by an Energy and Sustainability Statement (ESS), which has been revised to incorporate more efficient construction materials and construction practices including triple glazed windows as well as incorporating additional PV panels. The revised ESS demonstrates an onsite reduction in emissions of 78% below baseline with 19% being achieved through energy efficient measures including a highly insulated building fabric with low air permeability, double/triple glazing with suitable U-values, g-values and daylight transmittance, mechanical ventilation with heat recovery and low energy lighting.

7.130 The remainder of the reductions are achieved through the combination of photovoltaic panels (PVs) that would provide off-grid electricity and air source heat pumps (ASHPs), which would provide heating and hot water. The proposed photovoltaic panels have been amended to incorporate additional PVs as well as improving the combined PV rating from 60kWp to 108kWp and improving the individual panel power from 330W to 370W at peak capacity. It is considered that the PVs are not of a sufficient quality as the output of 330w is low with PVs now available that can achieve 370-400w. The amendments would improve the carbon reductions for the proposal and are welcomed. The proposed carbon reduction would be significant and is welcomed. A condition (26) is recommended requiring that the development is built in accordance with the approved ESS.

7.131 Additional conditions are recommended regarding water efficiency measures and sustainable sourcing of materials (27 and 15).

7.132 In order to achieve compliance with the 'zero carbon' homes standard, the applicant is required to make a financial contribution to the Council's Carbon Offset Fund. This would be secured through the S106 legal agreement.

7.133 Given the above assessment and subject to a S106 legal agreement and the recommended conditions (15, 26 and 27), it is considered that sufficient

consideration of sustainable design and construction has been included within the proposal and that the development would achieve an acceptable level of sustainability. The proposal is therefore considered to comply with the NPPF (2021), the London Plan (2021) policies S12, S14 and S15 and Local Plan (2015) policies EQ1 and EQ2.

Quality of Accommodation for Future Occupiers

- 7.134 London Plan policy D6 regards housing quality and standards and stresses the importance of meeting the minimum space standards; providing dual aspect homes that would receive adequate passive ventilation, daylight/sunlight and avoids overheating; incorporating sufficient storage space; and the provision of adequate outdoor amenity space.
- 7.135 Local Plan policy SC5 requires developments to meet the internal and external space standards and to have a high quality living environment.
- 7.136 All proposed homes meet or exceed all minimum floorspace requirements set out in the Nationally described space standards (2015), the London Plan policy D6, and Local Plan policy SC5.
- 7.137 The large majority of the proposed homes 93% (74 out of 80 homes) would benefit from either dual or triple aspect and the majority of rooms would not be overly deep. The six single aspect homes would be single bed flats and none would be north facing. All of the homes would be well laid out with sufficient layout of rooms ensuring bedrooms are located together and where possible away from living space. All homes would also be afforded with sufficient storage space and private amenity areas.
- 7.138 The proposed homes also comply with the Mayor's Housing SPG in terms of limiting the number of homes accessed from each core (eight); in the proposal a maximum of eight homes are accessed from a single core (in Blocks G1 and G2). However, this would be from an external deck access. All cores/external deck access would have access to natural light and ventilation.

Daylight and sunlight

- 7.139 89% (209 out of 236) of the habitable rooms within the proposal meet or exceed the BRE Guidelines for daylight for their room use when measured against ADF. A number of these failing rooms are kitchen/living/dining areas (KLDs) that meet or exceed the 1.5% requirement for living rooms, which is considered acceptable. This would increase the compliance rate to 92%. There are four living rooms/LKDs that fall below 1% (between 0.87-0.97%), which are the worst affected rooms. All other diminutions are considered to be minor.
- 7.140 Overall, while there are some diminutions, these are kept to a small percentage of the overall habitable rooms. Furthermore, the majority of these affected rooms would have acceptable diminutions given the urban location of the proposal. Therefore, the level of daylight afforded to the proposed homes within the development is considered to be acceptable.

- 7.141 Sunlight will be adversely affected if the centre of the window: receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable winter sunlight hours (APWSH) (between 21 September and 21 March); receives less than 20% its former sunlight hours during either period; and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours. The submitted daylight/sunlight report has carried out an assessment of all rooms irrespective of their use or orientation. Of the south facing windows tested, 46% of the windows would fully comply with the above requirements. The greatest reductions regarding south facing rooms are bedrooms.
- 7.142 However, the BRE guidance recommends that this test is only done for main living rooms as kitchens and bedrooms are considered less important in this respect. The BRE guidance also acknowledges that sunlight is less important than daylight in the amenity of a room and is heavily influenced by orientation. Additionally, only those windows within 90 degrees of due south should be assessed. Therefore, while there are a number of rooms that fall short of meeting the APSH and APWSH requirements, the percentage would be significantly higher than 46% if only living rooms that were orientated south were assessed.
- 7.143 Overall, while there are some diminutions in both APSH and APWSH to some rooms that face south, these include kitchens and bedrooms that are as not important as living rooms and the level of sunlight to the proposed homes is considered acceptable.

Privacy and outlook

- 7.144 The Ground floor homes within Blocks A, B, C, E1, E2, G1, G2 and G3 would be accessed from communal passageways with windows fronting onto these passageways that serve a mixture of hallways, kitchens and bedrooms. While this would result in some overlooking, the passageways would only be used by residents of the development and given the modest number of homes served by each passageway, the level of overlooking is considered to be negligible. Furthermore, the use of communal passageways (and open deck access at upper floor levels) would help develop a sense of neighbourliness between the residents. Ground floor homes within Block F incorporate defensible space with details of this secured through the recommended landscaping condition (16).
- 7.145 Generally throughout the proposal, the majority of homes have been designed in such a way (mainly through separation distances, orientation and layout) that the homes would benefit from acceptable levels of privacy. There is one pinch point within the proposal located at the south western corner of Block F, which is close proximity to both Blocks C and E1, in particular regard to balcony to balcony distances. However, design changes have been explored through the design process but this would have led to additional height within the roof space due to the need to re-locate roof terraces, which would be undesirable in design terms. Additionally, the overlooking would be limited to a small minority of homes within the proposal and would still retain window to window distances of at least 14m.

- 7.146 The bathroom window serving the home of G.0.1 and the secondary living room window serving the home of G.0.8 (both within Block G at ground floor level) would be required to be obscured glazed due to their locations fronting immediately onto shared areas and being at ground floor level. This would be secured through a recommended condition (12).
- 7.147 There are a number of amenity decks and balconies that adjoin one another, which serve different homes. Therefore, privacy screens would be required to be placed in between. Details would be secured through a recommended condition (12).
- 7.148 Overall, subject to the recommended conditions (12 and 16), the proposal is considered to receive acceptable levels of privacy, defensible space and outlook.

Noise and disturbance

- 7.149 Local Plan policy EQ5 seeks to reduce the impact of noise from aviation, transport and noise generating uses, and requires the location and design of new development to have considered the impact of noise, and mitigation of these impacts on new users and surrounding uses according to their sensitivity.
- 7.150 The site is located within the sensitive Heathrow Noise Contours and the proposal does incorporate family housing. This approach is considered appropriate for the location subject to the proposal incorporating sufficient noise insulation and other mitigation measures to provide acceptable internal noise environments, which would be secured through a recommended condition (14).
- 7.151 A Noise Impact Assessment (NIA) has been submitted and is based on detailed environmental noise measurements made at the proposed development site. An assessment of the external amenity areas is also included.
- 7.152 The NIA has been assessed by the Council's noise consultants who consider, after amendments, the report generally acceptable in terms of the proposed mitigation measures for the proposed homes internally. There are concerns regarding the potential noise impacts on both the private and communal outdoor amenity areas. However, detailed design aspects could be incorporated within the communal and private amenity areas to provide future residents a level of respite from the numerous noise sources. These details would be secured through a recommended condition (14) that would also include details for the mitigation measures for the internal arrangement of the proposed homes. These details would include, amongst others, details of window specifications, level of insulation and the proposed ventilation mechanisms.
- 7.153 A condition (30) is recommended requiring details of any plant machinery and achieving a rating level of 10 dB below measured background noise levels.
- 7.154 A condition (36) is also recommended preventing the use of any flat roofs that are not proposed as communal or private amenity areas from being used as any form of amenity space in order to prevent noise disturbance and overlooking.

7.155 Consequently, the scheme is considered acceptable with regard to noise levels subject to the recommended conditions.

Outdoor amenity space

Private amenity space

7.156 London Plan policy D6, Local Plan policy SC5 and the Mayor's Housing SPG state that each flat of up to two people should be provided with at least 5sq.m of private amenity space and 1sq.m for each additional occupant. However, Local Plan policy SC5 also requires that houses are provided with 75sq.m of private amenity space that has five or more habitable rooms.

7.157 Each home would be afforded private amenity space/s with direct access in the form of decks and balconies and with a small number of gardens. The vast majority of the homes would meet or exceed the minimum quantity of private outdoor amenity space (78 out of 80 homes) and would have minimum depths of 1.5m, which is a requirement of the Mayor's Housing SPG. These outdoor amenity spaces are considered to be well designed and functional. The proposal incorporates two houses that have five habitable rooms each and would have 26sq.m and 60sq.m in the form of rear gardens and balconies. This is considered to be a modest shortfall overall and would be offset through the provision of on-site communal amenity space and on-site children's play space as well as the proximity to Syon Park, which exceeds the minimum requirements. Overall, the level of private amenity space is considered acceptable.

7.158 The final details would be secured through the recommended materials and landscaping conditions (12 and 16).

7.159 In terms of private outdoor amenity spaces and sunlight, the majority within the proposal as a whole would receive more than 2 hours of sunlight when tested on the 21st of March as set out in the BRE guidelines. However, given the orientation of some (north west/north east facing), it is considered that there is no other reasonable location for these private amenity spaces to be located.

7.160 Overall, the quantum and quality of private amenity space for the proposed homes is considered acceptable. Additionally, the future residents of the proposal would also benefit from high quality communal outdoor amenity space as assessed further below.

Communal amenity space

7.161 Local Plan policy SC5 also requires the provision of outdoor communal amenity space and states that for each home of up to 3 habitable rooms 25sq.m should be provided, 30sq.m per home with four habitable rooms and 40sq.m per home with five habitable rooms, less a reduction for the area of private space provided for each home.

7.162 The table below provides details of the amenity space proposed, against the policy requirement for the proposed homes:

Amenity space type	Policy requirement Sq. m	Adjusted requirement (accounting for private space provided) Sq. m	Proposed (net against policy requirement) Sq. m
Private Gardens/ Balconies	516	N/A	798 (+282; 154%)
Communal Amenity	2165	1367	2,800sq.m (+1433; 205%)

Table 2: Outdoor amenity space provision

- 7.163 The above table has been calculated using only the amenity space which is available to all residents, and excludes the proposed allotments, public pathways and unusable sections of open space.
- 7.164 The overall policy requirement for communal outdoor amenity space is 1367sq.m when the proposed private amenity spaces have been taken into account. The proposal incorporates 2,800sq.m of communal outdoor amenity space, which also includes the proposed children's playspace within, which totals 896sq.m. However, even with the children's playspace deducted from the general communal outdoor amenity space, this would total 1904sq.m and would still far exceed the minimum requirement of 1367sq.m. Therefore, the quantum of the communal outdoor amenity is considered acceptable.
- 7.165 The proposed communal amenity space is provided at ground floor level in the form of a communal garden that is nestled in between the blocks running along Snowy Fielder Waye and Church Walk. The communal garden would receive acceptable levels of privacy but would provide outlook along Park Road through metal fencing and through existing and proposed planting. The communal garden incorporates a variety of landscaping and furniture as well as ancillary play spaces. Overall, the quantum, layout and design of the communal space would be of a high quality with details secured through a recommended condition (16).
- 7.166 The BRE Guidelines recommend that at least 50% of each amenity space receives at least 2 hours of sunlight on March 21st or experiences less than a 20% reduction in its area able to receive 2 hours of sunlight on March 21st in the existing situation. The BRE guidance does not provide further comment on the timing of those two hours of sunlight within the day relative to any peak use of that open space, nor suggest other standards be used for playgrounds or public open spaces.
- 7.167 In terms of daylight/sunlight to the proposed communal garden would exceed the BRE guidance.
- 7.168 Overall, subject to the recommended conditions, the proposed private and communal outdoor amenity for the future residents is considered to be of an acceptable quantum and quality.

Children's play space

- 7.169 London Plan policy S4 seeks to ensure that proposals include suitable provision for play and recreation with at least 10sq.m of play space per child.
- 7.170 The GLA's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012) sets out the proposed play space standards which requires play facilities to be provided where schemes generate a child yield of 10 children or more (between 0-15 years).
- 7.171 The GLA's play space calculator demonstrates that 542.1sq.m of play space is required for this scale of development as the proposal would generate a child yield of 54.2 children.
- 7.172 The proposal incorporates 896sq.m of playspace in total, with children aged between 0 to 3 being provided with 376sq.m, children aged between 4 to 10 provided with 356sq.m and children aged 11+ provided with 164sq.m. The overall quantum would far exceed the minimum requirement set by the GLA play space calculator as well as the requirements for the specific age groups.
- 7.173 The proposed playspace would be located within the two ends of the communal garden and therefore in a safe and secure location with a high level of passive surveillance. The proposal incorporates a variety of different types of playspace including informal and formal elements. This would include a level of doorstep play. All the playspaces would be tenure blind and accessible for all future residents.
- 7.174 Notwithstanding the above, details demonstrating the quantum, quality and type/specifications of play space would be secured through a recommended condition (16).
- 7.175 Therefore, the proposed children's play space, subject to the recommended condition, is considered acceptable in terms of quantum and quality.

Conclusion

- 7.176 Given the above assessment and subject to the recommended conditions, the proposal is considered to provide suitable accommodation and complies with the Nationally described space standards (2015), the London Plan (2021), the Local Plan (2015) policies SC5 and EQ5 and The GLA's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).

Fire Safety

- 7.177 London Plan policy D12 requires developments to contribute to the minimisation of potential physical risks, including those arising as a result of fire and requires all major development proposals to be submitted with a Fire Statement. The application was submitted prior to the 2021 London Plan being published. Notwithstanding that, the submitted Design and Access Statement (DAS) includes a section on fire safety.

- 7.178 The fire safety section within the DAS has been prepared to address the requirements of the above policy. The fire safety approach covers the active and passive fire safety and protection systems, means of warning and escape, external fire spread and access and facilities for the fire and rescue service and is considered acceptable.
- 7.179 Additionally, the London Fire Brigade were consulted on the application and is satisfied with the proposal subject to the buildings being designed and constructed to provide access and facilities for the fire service as per the requirement in Approved document part B5, which forms part of Building Regulations.
- 7.180 Given the above assessment, the proposal is considered acceptable regarding fire safety and complies with the London Plan (2021) policy D12.

Impact on Adjoining Occupiers

- 7.181 London Plan policy D6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, daylight/sunlight, overshadowing, wind and microclimate. These requirements are reflected in the Local Plan policy CC2.
- 7.182 Please refer to the Site Description section at the start of this report regarding the surrounding context of the site.

Daylight/Sunlight

- 7.183 A daylight/sunlight assessment has been submitted as part of the application to demonstrate the potential impacts of the proposal on the surrounding residential properties. The assessment has been carried out in accordance with the Building Research Establishment (BRE) guidelines "Site Layout Planning for Daylight & Sunlight. A Guide to Good Practice" (2011).

VSC, DD, and APSH/APWSH

- 7.184 The daylight/sunlight report submitted with the application applies Vertical Sky Component (VSC) tests that measure the amount of available daylight from the sky received at a particular window, Daylight Distribution (DD) (also known as the no skyline test (NSL)) that calculates the area at a working plane level inside a room that will have a direct view of the sky and APSH/APWSH that calculates the percentage of annual probable sunlight hours (APSH) and annual probable winter sunlight hours (APWSH) at the centre point of the window. Both the VSC and DD tests should be used to assess the impact on daylight.
- 7.185 VSC is assessed at the centre point of the window and looks at the angle of obstruction caused by the proposed development. The maximum value is 40% VSC for a completely unobstructed vertical window. The BRE guidance targets a VSC of 27% or more with this providing a good level of daylight. If this is not met, the reduction in light should not exceed 20% of the former VSC light levels. The BRE advises that acceptable levels of daylight can still be achieved if VSC levels are not reduced by more than 20%. If the loss is greater, then the

reduction in daylight would be noticeable with rooms likely to become darker, though the closer to the target the less noticeable the impact will be.

- 7.186 DD may be used where room layouts are known to assess where daylight falls within the room at the working plane (850mm above floor level in houses). The BRE says that if the area of the room that receives direct daylight is reduced by more than 20% then the occupants would notice the room being darker.
- 7.187 The available sunlight is measured in terms of the percentage of annual probable sunlight hours (APSH) at the centre point of the window. Sunlight will be adversely affected if the centre of the window: receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable winter sunlight hours (APWSH) (between 21 September and 21 March); receives less than 20% its former sunlight hours during either period; and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours. Only those windows within 90 degrees of due south are assessed. The BRE guidance recommends that this test is only done for main living rooms as kitchens and bedrooms are considered less important.

Assessment

- 7.188 The submitted report assesses the changes in the daylight/sunlight when compared to the existing arrangement. The report therefore assesses the impacts upon the changes to daylight/sunlight to existing residential properties. The report also assesses the shadowing impacts of the development upon the outdoor amenity spaces of the neighbouring properties.

No's 1-12 (inclusive) Snowy Fielder Way

- 7.189 All 72 windows assessed (100%) pass the VSC test and all 54 windows assessed (100%) pass the DD test.
- 7.190 In terms of sunlight, all 29 windows that face within 90 degrees of due south all meet the BRE Guidelines for annual and winter sunlight (APSH and APWSH respectively).
- 7.191 Therefore, all the above properties would not be materially impacted regarding daylight and sunlight.

No's 35-39 (inclusive) Snowy Fielder Way

- 7.192 All 35 windows assessed (100%) pass the VSC test and all 25 windows assessed (100%) pass the DD test.
- 7.193 In terms of sunlight, all 15 windows that face within 90 degrees of due south all meet the BRE Guidelines for annual and winter sunlight (APSH and APWSH respectively).
- 7.194 Therefore, all the above properties would not be materially impacted regarding daylight and sunlight.

Charlotte House (care home)

- 7.195 Out of 24 windows assessed 88% (21) pass the VSC test. Only 3 windows would experience a reduction of greater than 20% with an overall VSC of less than 27%, which is a low number of windows. These windows would experience reductions of VSC between 22% and 31%. Given the low number of windows affected and the modest reductions in VSC, the impact on VSC is considered acceptable.
- 7.196 Given that the layouts of the rooms were not known, an assessment against DD was not undertaken. However, as identified above, the level of daylight to Charlotte House is considered acceptable.
- 7.197 In terms of sunlight, out of 24 windows assessed 96% (23) that face within 90 degrees of due south would meet the BRE Guidelines for annual sunlight (APSH) i.e. receiving at least 25%. The one window that would fail the APSH would receive 17%. However, the existing level for this window was already below 25% (at 23%), which would result in a modest reduction of 26%.
- 7.198 Therefore, overall, Charlotte House would not be materially impacted regarding daylight and sunlight.

No. 4 Park Road

- 7.199 Out of 6 windows assessed 67% (4) pass the VSC test. Only 2 windows would experience a reduction of greater than 20% with an overall VSC of less than 27%, which is a low number of windows. These windows would experience reductions of VSC between 24% and 26%. Given the low number of windows affected and the modest reductions in VSC, the impact on VSC is considered acceptable.
- 7.200 Given that the layouts of the rooms were not known, an assessment against DD was not undertaken. However, as identified above, the level of daylight to No. 4 Park Road is considered acceptable.
- 7.201 In terms of sunlight, out of 5 windows assessed 80% (4) that face within 90 degrees of due south would meet the BRE Guidelines for annual sunlight (APSH) i.e. receiving at least 25%. The one window that would fail the APSH would receive 16%. However, the existing level for this window was already below 25% (at 22%), which would result in a modest reduction of 27%.
- 7.202 Therefore, overall, No. 4 Park Road would not be materially impacted regarding daylight and sunlight.
- 7.203 All other residential properties are considered acceptable in terms of daylight/sunlight due to the significant separation distances and that the closer properties have been found acceptable in daylight/sunlight terms and therefore an assessment in terms of VSC, DD, APSH or APWSH have not been undertaken for these properties.
- 7.204 Overall, given the flexibility provided within the BRE Guidelines, the proposal complies with Local Plan (2015) policy CC2 regarding daylight and sunlight.

Outlook

7.205 The proposed blocks of flats have been designed in such a way (restricting the overall height and massing, including stepping the building forms, reducing heights close to the site boundaries, providing sufficient separation distances and positioning the blocks so that they are not all directly in front of the existing residential buildings) so as to minimise their impact upon the outlook of existing residential properties. The description of the heights and massing and positioning of the proposed blocks of flats can be found in the above paragraphs.

Privacy

7.206 The proposal has been designed in such a way that there would be sufficient separation distances between the proposal and neighbouring properties that neighbouring properties would retain an acceptable level of privacy. Additionally, both No. 4 Park Road and Charlotte House would be located on the opposite sides of their respective streets, resulting in typical cross-street relationships.

7.207 Therefore, it is considered that the existing surrounding residents would retain acceptable levels of privacy.

Noise

7.208 London Plan policies D13 and D14 are in regard to the agent of change principles and noise respectively, which require proposals to, amongst others, avoiding significant adverse noise impacts on health and quality of life.

7.209 Local Plan policy EQ5 states that the Council will seek to reduce the impact of noise from aviation, transport and noise-generating uses, and require proposals to incorporate mitigation of these impacts on new users and surrounding uses according to their sensitivity.

7.210 The proposal would increase the number of homes in the area, resulting in an increased level of activity. Nevertheless, the site is located in a mixed area that incorporates residential uses, a care home, allotments and a large hospital further afield. Furthermore, the proposed homes would be distributed across the site in nine separate blocks. Therefore it is considered that the proposal would not result in any noise or disturbance that would be unusual or unacceptable within this setting and would be compatible with the existing homes in the area. Consequently, there are no concerns with regard to noise and disturbance arising from the proposed development. Additionally, conditions (36 and 30) are recommended preventing the use of flat roofs from being used as a form of outdoor amenity space and to address plant equipment noise and attenuation.

7.211 Concerns have been raised with regard to noise and disturbance during construction. Some noise and disturbance is inevitable during the development of a site. However, it is not expected that this would be unusually noisy or prolonged. The hours of construction and a Construction Logistics Plan would be secured by recommended conditions (29 and 6). If there are complaints regarding the construction activities on site these can be dealt with under Environmental Health legislation, which is outside of the planning process.

Lighting

- 7.212 Local Plan policy EQ6 states that when considering proposals for lighting the Council will seek to minimise light pollution and ensure there is adequate protection from glare and light spill to sensitive receptors.
- 7.213 Details of the proposed street lighting would be required to ensure that the lighting would meet Secure by Design standards and would meet the required lux levels for safe use through recommended conditions (16 and 9) both in terms of neighbour amenity and ecology.

Highways Issues

- 7.214 London Plan policy T1 states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 7.215 London Plan policy T2 states that developments should demonstrate how they support the ten Healthy Streets indicators in line with TfL guidance; reduce the dominance of vehicles on London's streets whether stationary or moving; and to be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
- 7.216 London Plan policy T4 states that developments should ensure that impacts on the transport capacity and the transport network are fully assessed and to take appropriate mitigation where necessary, including transport assessments and travel plans amongst others.
- 7.217 London Plan policy T6 states that development should provide secure, integrated and accessible cycle parking facilities while policy T7 states that the maximum car parking standards in table T6.1 should be applied and developments must provide electrical charging points to encourage the uptake of electric vehicles. Provision should be consistent with objectives to reduce congestion and traffic levels and to avoid undermining walking, cycling or public transport.
- 7.218 Local Plan policy EC2 seeks to secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport.
- 7.219 The site's Public Transport Accessibility Level (PTAL) is 1b/2 (poor). There are three bus services in the West Middlesex Hospital grounds within 400m of the site, with a further two services on Twickenham Road within 550m of the site. Isleworth's Large Neighbourhood Centre, as defined by the Local Plan, is 550m to the south. The site is not within a Controlled Parking Zone (CPZ) though the Church Street/Mill Plat CPZ does operate on the streets to the south of the site.

Access

- 7.220 Access to the site and the church beyond is currently taken from Park Road. The proposal incorporates the relocation of the main vehicular access to Snowy Fielder Waye, while retaining the existing Park Road access for larger vehicles,

such as the Council's refuse vehicles, and emergency services. The proposed arrangement is considered acceptable in principle. However, further details pertaining to the design, construction, and management of the accesses would be secured through the S106 agreement. These details would include the use of crossovers rather than junctions as currently proposed, narrowing the accesses where possible to reduce the pedestrian crossing distances, and the strict management and monitoring of the access from Park Road so that it is only used by vehicles that cannot otherwise access and egress the site and managed accordingly.

- 7.221 The primary vehicular and pedestrian access to the allotments would be directly from Snowy Fielder Way to the south of the residential access, with secondary vehicular access to the east of Block G. This arrangement is acceptable in principle. However, the proposed blue badge parking space off Snowy Fielder Way would need to be set further into the site to allow pedestrians to walk unhindered along the footway. Details of this would be secured through a recommended condition (18).
- 7.222 In line with the 'Healthy Streets' of the London Plan, an Active Travel Zone (ATZ) assessment was carried out for the walking and cycling environment between the site and key nearby destinations. A footway is proposed to be introduced along the eastern side of Snowy Fielder Way. This needs to link to the existing footway to the north of No 1 Snowy Fielder Way so that people are provided with a safe route between the site and the Isleworth neighbourhood centre that doesn't require them to cross Snowy Fielder Way on a bend. The lack of a continuous footway has also been identified in the Active Travel Zone survey as a problem. The plans therefore need to be revised secured within a recommended condition (21) and a S278 agreement to rectify this problem by linking the proposed new footway with the existing by setting the existing car parking further into the land adjacent to the footway.
- 7.223 The works to the highway would require a S278 agreement and an obligation included in the S106 that they be completed prior to occupation. A condition (21) is recommended for works that sit outside the public highway but within Council owned land.
- 7.224 The S106 agreement also requires a mechanism so that a public right of way for pedestrians and cyclists is secured through the site between Snowy Fielder Way and Park Road that follows the east-west road, which is currently named as 'Church Walk' in the proposal.
- 7.225 A condition (17) is recommended requiring satisfactory pedestrian visibility splays (2.4m x2.4m) are provided on either side of the accesses prior to occupation and retained thereafter.
- 7.226 The proposed landscaping along Park Road appears to overlap onto the public highway. This would not be acceptable. However, this can be rectified through the recommended landscaping condition (16) so that all of the landscaping is clear of the public highway. A slither (approximately 11m long and 1m wide) of the northernmost block would be built upon highway land adjacent to Snowy Fielder Way. Given the wide highway verge at this point (approximately 12m wide) this is not objectionable. However, this would require the area to be

Stopped Up to remove its status as public highway and would be secured in the S278 agreement.

7.227 Road safety audits for stages 1 and 2 would be secured through the S278 agreement.

Car parking

7.228 The proposal incorporates 48 car parking spaces including 4 blue badge spaces for the 80 homes. 41 of the car parking spaces would be within the basement with the remaining 7 at ground level. This equates to 0.6 spaces per home and adheres to the London Plan standards, which allows for up to 1 space for each home.

7.229 20% of the car parking spaces would be provided with active EV charging points, with the remaining spaces provided with passive infrastructure so that they can be easily converted to active bays in the future. Details of this would be secured within a Parking Management Plan (PMP) through a recommended condition (23), including details on EV specifications, allocation, disabled parking, how parking outside of marked bays will be prevented, controlled access, and measures to ensure that the spaces are used most efficiently. The parking spaces would need to be leased rather than sold with specific flats, and this would also be secured through the PMP. The PMP would also be required to include provisions so that an additional four blue badge parking bays can be provided in the future should demand dictate, as required by the London Plan.

7.230 Overnight parking surveys have been undertaken, which indicated that streets in the vicinity are already heavily parked, particularly Snowy Fielder Way on which no spaces were observed on either night surveyed.

7.231 Census data for the Mid-Super Output Area in which the site is located (Hounslow 020) indicates that the average car ownership level for the proposal would result in a total of 45.5 car parking spaces. Therefore, the provision of 48 parking spaces is considered an appropriate level and would accord with local and regional policies.

7.232 Although the proposed on-site parking capacity would cater for the anticipated parking demand from the proposal, to minimise occurrences of overspill parking, the Transport Assessment proposes that the homes should be made ineligible for parking permits for existing or future CPZs in the area. This would be secured as part of the S106 legal agreement. A financial contribution would also be required to consult existing residents about the possible introduction/extension of a CPZ where none already exist and about the satisfaction with the hours where one already exists. A further financial contribution would be required to enact any changes that come out of the consultations. These contributions would be secured as part of the S106 legal agreement.

Trip generation

7.233 To estimate the number of trips that would be generated by the proposal, the Transport Statement used the same TRICS survey results that were used for the

previous application (Ref: 00707/E/P110). As some of the comparison surveys were over five years old, Transport Officers requested that the exercise be redone using more up-to-date survey results.

7.234 An updated trip generation exercise – using comparable sites from the TRICS database with the modal split informed by Census data for the – was undertaken by the applicant and submitted in March 2021. These results estimate that there would be 16 two-way vehicle movements in the AM peak and 13 two-way vehicle movements in the PM peak generated by the development. This equates to approximately one additional movement every four minutes at peak times, which is not anticipated to have a significant impact on the local highway network.

Cycle parking

7.235 147 long-stay (resident) and 3 short-stay (visitor) cycle spaces are required for the residential element to comply with the London Plan standards. 97 spaces would be provided in the basement by utilising Sheffield stands and two-tier racks. A further 28 communal spaces are provided within a store in Block G, with some of the ground floor maisonettes (three homes) within Block G's 8 would benefit from 2 spaces within their private amenity areas when there is direct access to their rear gardens. 16 additional spaces are shown between Blocks A and B, B and C and inside Block F. This gives an overall provision of 147 long-stay spaces thereby complying policy in terms of numbers.

7.236 While some cycle parking would be located within secure structures, there are still some cycle parking spaces that would not be in secure structures. Thereby, these particular cycle spaces would be accessible to anyone within the communal areas, including visitors to the development, and this could discourage residents from using the spaces to store cycles due to security. Therefore, a condition (24) is recommended requiring details of all cycle parking spaces, including how they would be located within secure structures and the specifications of the two-tier racks.

7.237 6 short-stay cycle spaces formed using Sheffield stands would be provided adjacent to the concierge, which is considered acceptable. A further 2 Sheffield stands providing 4 spaces are shown inside the entrance to the allotments which is also acceptable.

7.238 Subject to the recommended condition, the proposed cycle parking is considered acceptable.

Travel planning

7.239 A Residential Travel Plan to encourage more active and sustainable modes of travel has been submitted. This would need to be updated to include details of the Travel Plan Co-ordinator and the remedial measures need to include an extension of the travel plan monitoring if the targets are not met after the initial five year period. A revised Travel Plan would be secured by way of the s106 agreement which would also secure the Travel Planning monitoring fee.

Deliveries and servicing

- 7.240 A loading bay would be provided on-site adjacent to the concierge's office. The concierge would be able to receive some parcels and other deliveries on behalf of residents, which would reduce dwell times for delivery vehicles and reduce the need for repeat trips if a resident was not at home.
- 7.241 The swept paths in the Transport Statement's appendices demonstrates that smaller delivery vehicles would be able to turn on-site to leave via Snowy Fielder Way, while larger vehicles would need to leave via Park Road through the retractable bollards. More detail is required demonstrating how the retractable bollard would be controlled and maintained to prevent misuse and failings, which would be secured in a revised Delivery and Servicing Plan (DSP) through a recommended condition.

Construction phase

- 7.242 A Construction Logistics Plan (CLP) and a separate Construction Environmental Management Plan (CEMP) would be required and secured through pre-commencement conditions (6 and 4). The CLP would be required to take construction vehicles directly off Park Road to minimise disturbance to residents of Snowy Fielder Way. The CLP should also incorporate a Staff Travel Plan to ensure that staff and contractors travel to the site by sustainable means, to avoid deliveries during school drop-off and pick-up times, and use operators that are FORS Silver accredited or better, along with satisfying the rest of the criteria that is listed in the condition, which include:
- confirmation that a pre-start record of site conditions on the adjoining public highway will be undertaken with Hounslow Highways and a commitment to repair any damage caused;
 - provision of wheel washing facilities at the site exit (mentioned compound entrance in the CLP) and a commitment to sweep adjacent roads when required and at the request of the council;
 - a scheme for recycling/disposing of waste resulting from demolition and construction works;
 - measures to ensure the safety of all users of the public highway especially cyclists and pedestrians in the vicinity of the site and especially at the access;
 - commitment to liaise with other contractors in the vicinity of the site to maximise the potential for consolidation and to minimise traffic impacts;
 - deliveries only between 9.30am-3pm
- 7.243 The detailed CLP would need to be worked up with the main contractor, once appointed, to ensure that it is realistic and achievable.

Environmental Considerations

Air Quality

- 7.244 London Plan policy SI1 states that proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality. Proposals must be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution.
- 7.245 Local Plan policy EQ4 states that the Council will seek to reduce the potential air quality impacts of development and promote improved air quality across the borough, in line with the Council's Air Quality Action Plan (AQAP, 2018).
- 7.246 The AQAP designates the whole borough as an Air Quality Management Area (AQMA) and identifies road transport as the major source of air pollution, giving rise to nitrogen dioxide and particulate matter which can cause respiratory illnesses and other adverse health effects.
- 7.247 The applicant has submitted an Air Quality Assessment (AQA) to support the application, which has been amended following concerns raised by the Council's Environmental Strategy officers, which now sufficiently address these concerns and is considered acceptable.

Contamination

- 7.248 Local Plan policy EQ8 states that the Council will ensure that contamination is properly considered and promote the remediation of land where development comes forward, consistent with the Council's Contaminated Land Strategy and the NPPF.
- 7.249 The submitted site investigation has been reviewed by the Council's Land Quality Officers who confirm that the proposal does not indicate significant risk to human health, controlled waters or ecology and wildlife associated with the development of the site as currently proposed.
- 7.250 Land Quality Officers are now satisfied with the submitted investigation and report. However, a condition (7) is recommended requiring a further investigation prior to commencement of the development and remediation during the construction period of the development, which is standard given the low risk. Therefore, the proposal is considered acceptable in terms of contamination subject to the recommended condition above.

Flood Risk/ Drainage

- 7.251 London Plan policy SI12 states that current and expected flood risk should be managed in a sustainable way in collaboration with the Environment Agency (EA), Lead Local Flood Authorities (LLFAs) and developers. The policy states that proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.

- 7.252 Local Plan policy EQ3 states that proposals would be required to submit a Flood Risk Assessment (FRA), which would apply the sequential approach as well as incorporating flood resistance measures and Sustainable Drainage Solutions (SuDS).
- 7.253 The site is located within Flood Zone 3 (i.e. land having a risk of more than a 1 in 100 annual probability (1%) of river flooding) and also identified as being in an area at medium risk of flooding from rivers and seas. There is also an area along the western boundary of the site which is identified as being at medium risk of surface water flooding, together with small areas along the eastern boundaries which are also identified as being at medium risk of surface water flooding.
- 7.254 The EA have confirmed that the site is also protected to a very high standard by the Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year flood event. The EA's latest flood modelling shows the site would be at risk if there was to be a breach in the defences or they were to be overtopped.
- 7.255 Residential homes fall within the "More Vulnerable" category of development set out in the Planning Policy Guidance to the NPPF regarding flooding and therefore the sequential and exception tests must be addressed.
- 7.256 An FRA (which includes a SuDS report) has been submitted, which determines the risks of flooding on the proposed development site and the likely impact of the development in terms of increased site runoff or drainage.
- 7.257 The aim of the sequential test is to steer new development toward areas with the lowest probability of flooding. Four comparative potential development sites were assessed within the FRA. However, it was concluded these alternative sites were not sequentially preferable. It is therefore considered that the application site passes the sequential test and that:
- there are no alternative sites available to the applicant; and
 - the proposed development would not increase the risk of flooding to the site or elsewhere in the catchment.
- 7.258 The exception test has also been applied to ensure that any risks have been properly assessed and that appropriate mitigation measures are provided as part of the proposed development. The FRA demonstrates that:
- the development provides wider sustainability benefits to the community that outweigh flood risk; and
 - the development would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.
- 7.259 It should be noted that all sleeping accommodation is located above the breach level. The FRA and associated SuDS report has been assessed by the EA who raise no objection to the proposal. The submitted documents have also been reviewed by the LLFA who raised initial concerns. The documents have been

revised to address these issues and are now considered acceptable in principle in terms of flood risk.

- 7.260 This demonstrates that the proposed development is acceptable in flood risk terms and accords with the NPPF, NPPG, London Plan policy S112 and Local Plan policy EQ3.
- 7.261 In terms of drainage, London Plan policy S113 states that proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible with a preference for green over grey features.
- 7.262 Local Plan policy EQ3 seeks to ensure surface water is managed through increased emphasis on sustainable drainage with proposals expected to incorporate sustainable drainage systems and avoid non-permeable hard standings, aiming to achieve greenfield run-off rates.
- 7.263 The SuDS report states that below ground attenuation tanks, tree pits, rain gardens and permeable paving would be incorporated within the development. The SuDS report has also been revised following initial concerns from the LLFA. The LLFA is satisfied that appropriate full details and detailed drainage designs can be secured by condition (10), including addressing the drainage hierarchy and in particular rainwater harvesting. This condition would also require evidence to demonstrate the development is carried out in accordance with the final approved details.
- 7.264 In terms of foul water drainage, there is an existing Thames Water 305 mm diameter foul water sewer under Park Road that the development would use.

Ecology

- 7.265 London Plan policy G1 states that London's network of green and open spaces as well as green features in the built environment should be protected and enhanced. Proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- 7.266 London Plan policy G5 states that major developments should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Residential proposals should target a score of 0.4 in terms of the Urban Greening Factor (UGF).
- 7.267 London Plan policy G6 states that proposals should manage impacts on biodiversity and aim to secure net biodiversity gain and where proposals reduce deficiencies in access to nature, they should be considered positively.
- 7.268 Local Plan policy GB4 states that proposals shall make a positive contribution to the green infrastructure network by improving its quality, functions, linkages, accessibility, design and management. Proposals should also incorporate elements of green infrastructure such as green roofs, sustainable drainage

systems, trees, squares, plazas and pedestrian access routes. The policy also requires proposals to demonstrate that there will be no significant adverse impact on the borough's green infrastructure.

7.269 Local Plan policy GB7 states that developments shall contribute to the greening of the borough, by incorporating green roofs and walls, landscaping, tree planting and other measures to promote biodiversity such as bat and bird boxes, through the preparation of ecological plan.

7.270 An Ecological Impact Assessment (EIA) has been submitted that includes a desk based study, an on-site phase 1 habitat survey, an on-site bat survey and an on-site reptile survey.

7.271 The EIA confirms that there are two internally statutory designated sites within a 7 km radius of the site, three national statutory designated sites within a 2 km radius of the site and 19 non-statutory designated site of nature conservation within a 2 km radius of the site, including the Syon Park Tide Meadow Site of Special Scientific Importance (SSSI) and the Isleworth Ait Local Nature Reserve (LNR). These two statutory designated sites are approximately 210m and 160m away from the site respectively. The site itself comprises unmanaged semi-improved grassland interspersed with horticultural beds and species-poor hedgerow and scattered trees on the boundaries. The habitats on site are common and widespread but given the site's location within a relatively built-up area, the habitats on site are considered to be of local value.

7.272 Additionally, the site does provide a suitable habitat for foraging and commuting bats and has the potential to support nesting birds. No reptiles were recorded as part of the Phase 2 survey and as such are considered absent from the site. A single tree on the site supports a bat box, whilst no other trees were recorded as having the potential to support roosting bats.

7.273 Despite the site having a low ecological value, due to the proposed removal of a number (a total of 22 individual trees and 10 groups of trees) of trees, scrub and grassland, the EIA makes a number of recommendations to mitigate impact from the development and ensure that the site is enhanced for wildlife and a gain in biodiversity is achieved.

7.274 The EIA identifies a number of opportunities that can be incorporated within the development to provide ecological benefits/enhancements, such as:

- Native broad leaved trees (no. 71), fruit trees, hedgerows and planting;
- 'Wild plots' within the retained area of allotments, sown with a wildflower seed mix;
- Improved connectivity of green infrastructure with new hedgerow planting and infill planting;
- Rain gardens, which would be planted with native wetland species.
- Any new lawn areas will be sown with a wildflower seed mix;

- Provision of new bat roosting, bird nesting on proposed buildings and on existing mature trees;
- Creation of log piles from felled trees on site and compost heaps to provide additional shelter and foraging resources for a wide range of fauna;
- Provision of hedgehog boxes to create sheltering opportunities.

7.275 The EIA also recommends precautionary measures such as the number and type of external lighting so as not to impact upon bats, details of which would be secured through a recommended condition (9) requiring an Ecological Management Plan (EMP).

7.276 The EIA also recommends a total of 20 bat boxes, 10 bird boxes, four log piles and 4 insect blocks.

7.277 The proposal also incorporates a green roof and a condition (13) is recommended requiring that it is demonstrated the green roof would accord with the GRO Green Roof Code 2014, which would include details such as substrate depth and content, planting mix and other ecological features.

7.278 This approach is considered to provide sufficient biodiversity net gains. However, full details of the above enhancements and mitigation measures will be required as part of the EMP (condition 9).

7.279 The proposal demonstrates an Urban Greening Factor (UGF) of 0.41, which would meet the minimum UGF calculation as per policy requirements. However, the proposal does not provide a Biodiversity Net Gain (BNG) calculation.

7.280 The emerging policy in the Local Plan Review requires a minimum BNG calculation of 10%. Therefore, as part of the EMP, details of how the proposal would achieve the stated 0.41 UGF and the required 10% BNG is required.

7.281 The EIA makes other recommendations with regards to when works should be carried out in relation to bats, birds, reptiles and other species. These are all agreed and would be secured by through the EMP (condition 9).

7.282 Therefore, while there would be some loss of biodiversity and habitats through the development, it is considered that the proposed mitigation and enhancement measures would sufficiently address this loss.

7.283 It is considered reasonable and necessary to require the submission of additional details by conditions in order to ensure the development is acceptable and ensure the preservation, enhancement and maintenance of the environment.

7.284 Given the above assessment and subject to the recommended conditions, it is considered that the proposal would protect and enhance the local ecology and complies with London Plan (2021) policies G6 and G7 and Local Plan (2015) policies GB4 and GB7.

Trees

- 7.285 London Plan policy G7 states that proposals should ensure that, where possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement. The planting of additional trees should also be incorporated and particularly large-canopied species.
- 7.286 Local Plan policies GB4 and GB7 state that proposals should incorporate green infrastructure, including trees.
- 7.287 An Arboricultural Impact Assessment and Method Statement (AIA) has been submitted, which has assessed the impacts of the proposal on the existing tree stock. The AIA outlines that the proposal would result in the removal of a number of scattered trees (a total of 22 individual trees and 10 groups of trees), which are mostly Category C (low quality) with only 5 being Category B (medium quality) with none being Category A (high quality). Whilst the removal of these trees is undesirable, 10 existing trees would be retained with a further 71 replacement trees being planted, which is a significant uplift. The EIA identifies that the 71 proposed replacement trees would be native broad leaf species, offering a new age cohort of diverse trees, including many more forms of tree, both in terms of species and provenance. The proposed range of trees incorporate four distinct groups, including street trees (ranging in height between 4-6m), feature trees (ranging in height between 4-4.5m), communal garden trees (ranging in height from 4-5.5m), and fruit trees (ranging in height from 2.5-4.5m). The contribution to the overall quality of tree stock, details of which would be secured as part of the EMP condition (9).
- 7.288 The AIA also identifies how the retained (within or adjacent to the construction site) and proposed trees would be protected both during the construction period (regarding the retained trees) and through the lifetime of the development, in line with BS 5837:2012 Trees in relation to design, construction and demolition. This is considered appropriate and would be secured through a recommended condition (32).
- 7.289 Therefore it is considered that the retained trees would be suitably protected and that the loss of the removed trees would be sufficiently offset through the provision of 71 new trees. The proposal is considered to comply with London Plan (2021) policies G5, G6 and G7 and Local Plan (2015) policies GB4 and GB7.

Waste Management

- 7.290 The residential waste would be stored at ground floor level within each proposed block with refuse collection vehicles able to pull up alongside each of the new blocks within 10 metres of the bin stores. The quantum and arrangement of the proposed waste stores are in accordance with Local Plan policy EQ7 and the West London Waste Plan.
- 7.291 Given the above assessment, the proposal complies with Local Plan (2015) policy EQ7 and the West London Waste Plan (2015).

Health Impacts

- 7.292 London Plan policy GG3 states that the impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA). This is supported in Local Plan policy CI3.
- 7.293 The application has been accompanied by a HIA that identifies that the future residents would benefit from high quality accommodation, improved public realm and surrounding environment, which encourages physical activity and sustainable modes of transport.
- 7.294 The report also identifies that the main potential negative impacts upon the existing residents would be during the construction phase of the development, which would be managed through a Construction Logistics Plan secured through a condition (6) and Environmental Health legislation. The report also notes that the reduction in Local Open Space would have a neutral impact on the existing residents as the existing allotments were only accessible to allotment holders and their friends and family rather than the wider existing community and there are a number of formal and informal open spaces within a short walking distance.
- 7.295 This is a relatively small scheme of 80 homes. There is no significant site-specific impact to justify a financial contribution in this instance.

Planning Obligations

- 7.296 Local Plan policy IMP3 seeks to ensure that developments fully mitigate the impacts of the development on the area through planning obligations. Such obligations are usually secured within a Section 106 agreement having regard to supplementary planning document and provide the CIL payments required by any charging scheduled, including the Mayor of London's CIL. A payment or other benefit offered in a Section 106 agreement is not material to a decision to grant planning permission and cannot be required unless it complies with the provisions of the Community Infrastructure Levy Regulations 2010 (regulation 122), which provide that the planning obligation must be:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.
- 7.297 A Section 106 agreement may not address all of the impacts of a development since some of these may be addressed by CIL, in order to satisfy the Regulation 122 tests above.
- 7.298 The NPPG provides guidance on use of planning obligations, which may impose a restriction or requirement, or provide for payment to make acceptable development proposals that might otherwise not be acceptable in planning terms. The Council's Supplementary Planning Document on Planning Obligations (2008) contains guidance on imposition of planning obligations in

compliance with such guidance. These obligations may offset shortfalls in the scheme or mitigate a development's impacts.

7.299 The recommendation to approve this application is subject to the legal agreement requiring the following:

- Restoration works to Syon House and Syon Park through the ongoing revenue of the development
- To carry out the works in accordance with the programme in a period not exceeding 20 years following first occupation of the development
- Affordable housing early and late stage reviews
- Securing 30 residential homes for key workers on a long lease
- Securing the use of the allotments for a minimum period of 50 years
- A Management and Maintenance Plan for the allotments
- Residential Travel Plan
- A public right of way for pedestrians and cyclists through the site between Snowy Fielder Way and Park Road that follows the east-west road
- Future residents to be made ineligible for parking permits for existing or future CPZs in the area
- Financial contributions to consult existing residents on potential introduction/extension of a CPZ (£3,000) and to enact any changes following CPZ consultation (£12,000) – A clause would be included to enable the £12,000 to be spent on active travel improvements in the vicinity if the results of the consultation process comes back negative
- Highway works (works to be undertaken under a s278 agreement including accesses, etc) agreed prior to commencement and works completed prior to occupation of the development. This would comprise new/amended vehicle access to Park Road and Snowy Fielder Way and the construction of a footway along the eastern side of Snowy Fielder Way
- Strict management and monitoring of the access from Park Road
- Construction Training – onsite or contribution (£2,750 per £1m construction cost) £59,455
- Carbon Offset Fund Contribution £91,200
- Considerate Contractor Scheme
- Travel Plan monitoring £2,318.40

Equalities Duties Implications

- 7.300 The public sector equality duty applies to all council decisions.
- 7.301 A public authority or any person who exercises public functions must, in the exercise of those functions, have due regard to the need to:
- a) eliminate discrimination, harassment, victimisation and any other conduct prohibited by or under the Act;
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.302 Having due regard to the need to advance equality of opportunity, this involves having due regard, in particular, to the need to:
- a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 7.303 This shall include, in particular, but is not limited to steps to take account of disabled persons' disabilities.
- 7.304 The exercise of public functions must have due regard to the need to foster good relations between persons who share a relevant protected characteristic and those who do not, in particular, to the need to:
- a) tackle prejudice; and
 - b) promote understanding
- 7.305 Compliance with these duties may involve treating some persons more favourably than others. This is not to be taken as permitting conduct that would otherwise be prohibited by or under the Act.
- 7.306 The relevant protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; marriage and civil partnership; and sexual orientation.
- 7.307 Due regard needs to be demonstrated in the decision making process and requires an analysis of the material with the specific statutory considerations in mind. It does not follow that the considerations raised will be decisive in a particular case the weight given to them will be for the decision maker. The

equalities duty is not a duty to achieve a particular result. Some equalities considerations are covered under other legislation such as building control matters. Officers have in considering this application and preparing this report had regard to the public sector equality duty and have concluded that due regard has been given to the Council's duty in respect of its equalities duties and that if approving or refusing this proposal the Council will be acting in compliance with its duties.

Local Finance Considerations and the Community Infrastructure Levy

7.308 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. A local finance consideration means:

- a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
- b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).

7.309 The weight to be attached to a local finance consideration remains a matter for the decision maker. The Mayor of London's CIL and Hounslow CIL are therefore material considerations.

7.310 Most new development which creates net additional floor space of 100 square metres or more, or creates a new dwelling, is potentially liable to pay the CIL to Hounslow and the Mayor of London.

Floor space (sqm)	Existing lawful floor space	Demolished floor space	CIL liable floor space
	0	0	2,302

7.311 The above is calculated in relation to the new development, rather than the existing buildings which are to be retained and not altered as part of this permission.

7.312 This proposal would be liable to pay the CIL which is index linked.

7.313 The estimated Hounslow CIL payable is £253,220.00 and Mayoral CIL payable is £138,120.00. This does not include any exemptions which may be sought.

8.0 CONCLUSION

8.1 The proposal is broadly compliant with the statutory development plan. However, where there are areas of non-compliance this must be balanced against the planning and heritage benefits arising from the proposal.

8.2 In relation to the loss of Local Open Space (LOS), the site is not within an area of deficiency. Syon Park is opposite the site and provides a very significant amenity for the local community of this area. The loss of LOS is contrary to policy but must also be considered in the context of the retained allotment

provisions that would be provided within the site and the proposal's sensitive design and the significant green landscaping proposed on site. The impact of the loss of LOS is limited and that visual amenity is partly replaced. In addition, the loss of LOS also needs to be balanced against the other benefits arising from the proposal, as identified below.

- 8.3 In particular, the proposal offers a series of heritage benefits to Syon House and the wider Syon Park estate that carries significant planning weight. The revenue generated by the proposal would enable significant conservation and refurbishment works to the Grade I listed Syon House and Grade I listed Syon Park. When considered against the statutory provisions above, the proposal would clearly enable the preservation of the Grade I listed Syon House and Grade I listed Syon Park.
- 8.4 The proposal would result in a high quality housing scheme, which would sit sympathetically in surrounding context. The proposal incorporates 40% of affordable housing through a combination of Discount Market Rent (DMR) and London Living Rent (LLR) (in spite of the proposal being unviable) with the remainder of non-affordable homes being Build to Rent (BtR), which would help meet London's housing need and the nature and deliverability of the development would contribute positively and actively to meeting the overall housing requirement for Hounslow over the Local Plan period 2015-2025. The proposal would also provide 30 homes for key workers for the nearby West Middlesex University Hospital on a long lease.
- 8.5 Further, the proposal, through introducing a comprehensive landscape strategy and a variety of new plant species, would enhance the sustainability and biodiversity of the site.
- 8.6 It is therefore considered that, on balance, the proposed development is an appropriate response to the planning framework and is acceptable.

9.0 RECOMMENDATION:

1. That planning permission be granted subject to the following conditions (or minor variations of such) and securing the abovementioned planning obligations by the prior completion of a satisfactory legal agreement or unilateral undertaking made under Section 106 of the Town and Country Planning Act 1990 and of highways agreements under Sections 38 and 278 of the Highways Act 1980 (at the appropriate time) or other appropriate legislation, the exact terms of which shall be negotiated by appropriate officers within the Housing, Planning and Communities Department on the advice of the Assistant Director Corporate Governance.
2. The satisfactory legal agreement or unilateral undertaking outlined above shall be completed and planning permission issued by 14/02/2022 or such extended period as may be agreed in writing by appropriate officers within the Housing, Planning and Communities Department or within Legal Services.
3. If the legal agreement or unilateral undertaking is not completed by the date specified above (or any agreed extended period), then the Chief Planning Officer or Head of Development Management is hereby authorised to refuse

planning permission for the reason that the proposal should include planning obligations required to make the development acceptable in planning terms in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, development plan policies and the Planning Obligations SPD, as described in this Report.

4. Following the grant of planning permission, where (a) requested to enter into a deed of variation or legal agreement in connection with the planning permission hereby approved and by the person(s) bound by the legal agreement authorised in paragraph 1 above, and (b) where the planning obligations are not materially affected, and (c) there is no monetary cost to the Council, (d) make minor variation to wording of conditions, the Chief Planning Officer or Head of Development Management is hereby authorised (in consultation with the Chair of the Planning Committee and upon the advice of the Assistant Director Corporate Governance) to enter into a legal agreement(s) (deed of variation) made under Sections 106 and/or 106A of the Town and Country Planning Act 1990 and or other appropriate legislation.
5. If planning permission is refused following the failure to sign a legal agreement in time, the Assistant Director for Planning and Development or Head of Development Management (in consultation with the Chair of the Planning Committee) is hereby authorised to approve any further application for planning permission validated within 12 months of the date of refusal of planning permission, provided that it (a) duplicates the planning application, and (b) that there has not been any material change in circumstances in the relevant planning considerations, and (c) that a satisfactory legal agreement or unilateral undertaking securing the obligations set out in the Report is completed within any specified period of time.

Conditions:

1 Three year time limit

The development hereby permitted shall be begun within 3 years from the date of this permission.

Reason: To prevent the accumulation of unimplemented planning permissions and to comply with Section 91 of the Town and Country Planning Act 1990 (as amended) and to meet the requirements of Section 51 of the Planning and Compulsory Purchase Act 2004 and to meet the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

2 In accordance with approved drawings

The proposed development shall be carried out in all respects in accordance with the proposals contained in this application and the plans submitted:

Drawings:

Received 24/09/2021:

PAR-PTE-ZZ-ZZ-DR-A -10001-P1; PAR-PTE-ZZ-ZZ-DR-A -10002-P1;
PAR-PTE-ZZ-ZZ-DR-A -10005-P1; PAR-PTE-ZZ-ZZ-DR-A -10006-P1;
PAR-PTE-ZZ-00-DR-A-10100-P4; PAR-PTE-ZZ-RF-DR-A-10104-P3;

PAR-PTE-Z1-00-DR-A-10100-P3; PAR-PTE-Z1-01-DR-A-10101-P2; PAR-PTE-Z1-02-DR-A-10102-P2; PAR-PTE-Z1-03-DR-A-10103-P3; PAR-PTE-Z1-B1-DR-A-10099-P2; PAR-PTE-Z2-00-DR-A-10100-P4; PAR-PTE-ZZ-ZZ-DR-A-10101-P1; PAR-PTE-ZZ-ZZ-DR-A-10101-P1; PAR-PTE-ZZ-ZZ-DR-A-10201-P1; PAR-PTE-ZZ-ZZ-DR-A-10300-P4; PAR-PTE-ZZ-ZZ-DR-A-10305-P1; PAR-PTE-ZZ-ZZ-DR-A-10306-P3; PAR-PTE-VE-ZZ-DR-A-10307-P4; PAR-PTE-VG-ZZ-DR-A-10308-P3; PAR-PTE-ZZ-ZZ-DR-A-10315-P1; PAR-PTE-ZZ-ZZ-DR-A-10316-P1; PAR-PTE-VE-ZZ-DR-A-10317-P3; PAR-PTE-VF-ZZ-DR-A-10318-P1; PAR-PTE-ZZ-ZZ-DR-A-10319-P1; PAR-PTE-ZZ-ZZ-DR-A-10320-P1; PAR-PTE-ZZ-ZZ-DR-A-10401-P1; PAR-PTE-ZZ-ZZ-DR-A-10402-P1; PAR-PTE-ZZ-ZZ-DR-A-10403-P1; PAR-PTE-ZZ-ZZ-DR-A-10404-P2; 766-FH-XX-00-DP-L-101-P3.

Received: 09/09/2021:

PAR-PTE-ZZ-ZZ-DR-A-10701-P1; PAR-PTE-ZZ-XX-SH-A-99600 Rev E

Documents:

Design and Access Statement (Produced by Pollard Thomas Edwards; dated November 2020); Design and Access Statement: Playspace Addendum (Produced by Pollard Thomas Edwards; received 21/09/2021); Additional tree information (received: 01/10/2021); Flood Risk Assessment & SuDS Strategy Report Rev 05 (Produced by Heyne Tillett Steel; Dated: September 2021); Air Quality Assessment (Ref: P9214J704b Rev v3.0; Produced by Jomas Associates Ltd; dated 27/09/2021); Energy and Sustainability Statement Rev C (Produced by Etude; dated September 2021); Feasibility Cost Estimate Rev G (Produced by CSA; dated 23/12/2020); Statement from Northumberland Estates (received 21/09/2021); Daylight, Sunlight and Overshadowing Assessment Report (Ref: 62429/01/TRL/BK; produced by Lichfields; received 14/09/2021); Acoustic Note AP02.ad.103092A (Produced by Acoustics Plus; dated 16/06/2021); Transport Note (Produced by Caneparo Associates; received 03/06/2021); Outline Construction Logistics Plan (Produced by Caneparo Associates, dated November 2020); Urban Greening Factor (Produced by Farrer Huxley; dated December 2020); Health Impact Assessment (Produced by Lichfields; dated 03/12/2020); Heritage, Townscape and Visual Impact Assessment (Produced by Lichfields; dated December 2020); Statement of Community Involvement (Produced by Lichfields; Dated December 2020); GLA Carbon Emission Reporting Spreadsheet (received 16/12/2020); A Written Scheme of Investigation for an Archaeological Evaluation (Produced by AOC Archaeology Group; dated September 2016); Arboricultural Impact Assessment and Method Statement Rev B (Produced by Greenspace Ecological Solutions; Dated November 2020); Construction Method Statement (Produced by Blue Sky Building; Dated November 2020); Geo-Environmental & Geotechnical Assessment Report (Produced by Jomas Associates; Dated 13/11/2020); Historic environment assessment (Produced by Mola; Dated November 2020); Residential Travel Plan (Produced by Caneparo Associates; Dated November 2020); Archaeological Evaluation Report (Produced by AOC Archaeology Group; dated October 2016); Ecological Impact Assessment

(Produced by Ecosa Ltd; Dated December 2020); Delivery and Servicing Plan (Produced by Caneparo Associates; Dated November 2020); Planning Statement (Produced by Lichfields; dated December 2020); Transport Assessment (Produced by Caneparo Associates; Dated December 2020); Financial Viability Assessment Report (Produced by Savills; Dated August 2021).

Reason: To ensure the development is carried out in accordance with the planning permission, a satisfactory standard of development is secured and to allow the local planning authority to review any potential changes to the scheme.

3 **Archaeology (Historic England)**

Prior to the commencement of development, including any demolition works, a written scheme of investigation (WSI) shall be submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and:

- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works; and
- B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

Reason: In order to safeguard the site in terms of its archaeological interest in accordance with Local Plan (2015) policy CC4 and London Plan (2021) policy HC1, coupled with the requirements of the National Planning Policy Framework 2021.

4 **Piling Method Statement**

No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. In accordance with Local Plan (2015) policy EQ3 and London Plan (2021) policy SI5, coupled with the requirements of the National Planning Policy Framework 2021.

5 **Construction Environment Management Plan**

Prior to the commencement of development, including any demolition works, a detailed Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall provide details of how demolition and construction works are to be undertaken and include:

- i. The identification of stages of works;
- ii. measures to mitigate noise, dust and air quality;
- iii. details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays);
- iv. Procedures for maintaining good public relations including complaint management, public consultation and liaison;
- v. Mitigation measured as defined in BS 5228: Parts 1 and 2: 2009 Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from construction works.

Reason: In order to safeguard the amenities of adjoining residents and the amenities of the locality in accordance with Local Plan (2015) policies CC1, CC2, GB7, EQ4 and EQ5, London Plan (2021) policies D14, G6 and SI1, coupled with the requirements of the National Planning Policy Framework 2021.

6 Construction Logistics Plan

Prior to the commencement of development, including any demolition works, and notwithstanding the approved details, a revised Construction Logistics Plan shall be submitted to, and approved in writing by, the Local Planning Authority. The Plan shall accord with TfL guidance and shall include:

- i. a site plan (showing the areas set out below);
- ii. confirmation that a pre-start record of site conditions on the adjoining public highway will be undertaken with Hounslow Highways and a commitment to repair any damage caused;
- iii. a Staff Travel Plan to ensure that staff and contractors travel to the site by sustainable means;
- iv. provision for the parking of vehicles of site operatives and visitors;
- v. provisions for loading, unloading and storage of plant and materials within the site;
- vi. details of access to the site, including means to control and manage access and egress of vehicles to and from the site for the duration of construction including phasing arrangements;
- vii. details of vehicle routeing from the site to the wider strategic road network;
- viii. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;

- ix. provision of wheel washing facilities at the site exit and a commitment to sweep adjacent roads when required and at the request of the council;
- x. a scheme for recycling/disposing of waste resulting from demolition and construction works;
- xi. measures to ensure the safety of all users of the public highway especially cyclists and pedestrians in the vicinity of the site and especially at the access;
- xii. commitment to liaise with other contractors in the vicinity of the site to maximise the potential for consolidation and to minimise traffic impacts;
- xiii. avoidance of peak hours for deliveries and details of a booking system to avoid vehicles waiting on the public highway;
- xiv. all necessary traffic orders and other permissions required to allow safe access to the site to be secured and implemented prior to commencement of construction;
- xv. details of the construction programme and a schedule of traffic movements;
- xvi. the use of operators that are members of TfL's Freight Operator Recognition Scheme (FORS);
- xvii. confirmation that all vehicles associated with the works will only park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions; and
- xviii. measures to mitigate noise, dust and air quality.

The approved Plan shall be adhered to throughout the construction period.

Reason. To ensure highway safety is maintained and preserved and in the interests of air quality and neighbour amenity in accordance with policies EQ2, EQ4 and EC2 of the Local Plan (2015), coupled with the requirements of the National Planning Policy Framework 2021.

7 Contamination

Prior to the commencement of development, including any demolition works:

- A. Once the existing electricity substation is decommissioned and demolished, necessary risk assessment associated with the area of the substation are required in addition to the phase 1 desk study and phase 2 intrusive investigation previously submitted. These details shall be submitted to, and approved in writing by, the Local Planning Authority. The site shall be investigated by a competent person to identify the extent and nature of contamination. The report should include a tiered risk assessment of the contamination based on the proposed end use of the site. Additional investigation may be required where it is deemed necessary.
- B. If required, a scheme for decontamination of the site shall be submitted to the Local Planning Authority, for written approval. The

scheme shall account for any comments made by the Local Planning Authority before the development hereby permitted is first occupied.

During the course of the development:

- C. The Local Planning Authority shall be notified immediately if additional contamination is discovered during the course of the development. A competent person shall assess the additional contamination, and shall submit appropriate amendments to the scheme for decontamination in writing to the Local Planning Authority for approval before any work on that aspect of development continues.

Before the development is first brought into use:

- D. The agreed scheme for decontamination referred to in clauses b) and c) above, including amendments, shall be fully implemented and a written validation (closure) report submitted to the Local Planning Authority for approval.

Reason: Contamination is known or suspected on the site due to a former land use. The LPA therefore wishes to ensure that the development can be implemented and occupied with adequate regard for public and environmental safety, in accordance with policy EQ8 of the adopted Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

Supporting notes:

- a) An initial phase 1 desk study and a Phase 2 intrusive investigation have been submitted with the original application and is considered satisfactory.*
- b) The scheme for decontamination shall provide details of how each potential pollutant linkage, as identified in the conceptual model, will be made safe.*
- c) In some instances the LPA may require work on site to be ceased whilst the nature of additional contamination is investigated fully.*
- d) The validation report shall revisit the site conceptual model, and provide evidence that each aspect of the decontamination scheme was carried out correctly and successfully. This report shall prove that the development is suitable for its new use.*
- e) We request that site investigation reports or site plans be sent electronically to landquality@hounslow.gov.uk or by post on a cd or dvd wherever possible.*

8 Air Quality – HDV movements

Prior to the commencement of development, including any demolition works:

A detailed air quality assessment of the maximum HDV movements associated with the construction phase of the development is to be undertaken. Surrounding sensitive receptors along the expected routes (Park Road and Snowy Fielder Lane) are to be included within the

assessment.

Reason: In order to ensure that surrounding sensitive receptors will not be exposed to a significant increase in poor air quality, in accordance with policies EC2 and EQ4 of the Local Plan (2015) and policy SI1 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

9 **Ecological Management Plan**

Prior to the commencement of development, including any demolition works, an Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority.

The Ecological Management Plan shall incorporate:

- i. details of measures to protect breeding birds, nests and eggs from mortality/damage, injury and disturbance, including avoidance by timing and/or appropriate supervision;
- ii. details of the ecological clerk of works supervision to be put in place to monitor the clearance of vegetation to ensure no impact on undiscovered or other unexpected faunal encounters;
- iii. details of the removal, long-term management or eradication of the invasive species found on the site,
- iv. an ecological lighting plan, including the number, location and specifications of the proposed external lighting;
- v. details of ecological enhancement, biodiversity net gains and an urban greening factor, including how a minimum urban greening factor of 0.41 and a 10% biodiversity net gain are to be delivered and achieved on site;
- vi. details of how the enhancement measures will be monitored, managed and maintained, including the long-term design objectives, management responsibilities and maintenance schedules;
- vii. additional detail on location and type (including specifications) of bird/bat boxes and other ecological enhancements, maintenance and a commitment that any data collected is to be shared with the Council; including 20 bat boxes; 10 bird boxes; 4 log piles; 4 x insect blocks; hedgehog boxes to be installed within the approved development; and
- viii. species surveys within and around the site to demonstrate ecological enhancements.

The development shall then be carried out in strict accordance with the approved details.

Reason: In the interest of maintaining ecology and to result in a net gain in biodiversity in accordance with policies GB4 and GB7 of the Local Plan (2015) and policies G5, G6 and G7 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021 and under the Wildlife and Countryside Act 1981.

10

Drainage Strategy

- A. Prior to commencement of groundworks (excluding site investigations and demolition) and notwithstanding the approved details, the applicant must submit a final detailed drainage design including drawings and supporting calculations and an updated Drainage Assessment Form to the Lead Local Flood Authority for review and approval, aligned with the approved drawings. It should be shown that rainwater harvesting techniques and green infrastructure have been considered within the design. Proposed runoff rates from the site must be no more than three times the greenfield runoff rate. It should be shown that on-site flow as a result of the 1 in 100 year event with a climate change consideration are suitably managed. A detailed management plan confirming routine maintenance tasks for all drainage components and the company responsible for ownership of these maintenance tasks must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.
- B. No building hereby permitted shall be occupied until evidence (photographs and installation contracts) is submitted to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all of the proposed drainage components.

Reason: To prevent the risk of flooding to and from the site in accordance with relevant policy requirements including but not limited to London Plan (2021) policies SI12 and SI13 and the Non-Statutory Technical Standards for Sustainable Drainage Systems and Local Plan (2015) policy EQ3 coupled with the requirements of the National Planning Policy Framework 2021.

11

Details of allotment community building

- A. Prior to above ground works commencing, details of the allotment community building shall be submitted to and approved in writing by the local planning authority, which shall include:
- Plans, elevations and sections at 1:50
 - Detailed drawings at 1:20
 - External materials
- B. Prior to the occupation of any residential home, the allotment community building must be fully occupational.

Reason: In order that the Council may be satisfied as to the details of the development in the interests of the visual amenity of the area and to ensure that the allotment community building is available for use when the allotments are complete and to satisfy the requirements of policies CC1, CC2, CC4 and GB8 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

Details of external materials

- A. Prior to above ground works commencing, samples of all materials to be used in the construction of the external surfaces of the development hereby permitted shall be submitted to and approved in writing by the local planning authority, which shall include:
- brick (including brick, feature brick panel, brick framing feature);
 - Tiles/roof covering;
 - window treatment (including sections/reveals);
 - balcony details (including soffits, panels and frame);
 - all privacy measures, (including obscure glazing details, privacy screens etc.);
 - balustrading treatment (including details/ sections/ materials);
 - rainwater goods;
 - Hard landscaping;
 - any other materials/details to be used.
- B. Prior to above ground works commencing, detailed drawings at a scale of 1:20 (or other scale to be agreed in advance by the local planning authority) shall be submitted to and approved by the local planning authority. Such details shall include:
- Elevational bay studies;
 - window reveals and screening;
 - privacy screens to balconies and obscured glazed windows;
 - window frames;
 - entrance doors and external door frames;
 - junctions between changes in materials;
 - brick articulation;
 - fenestration detailing;
 - roof/eaves detailing;
 - soffit detailing;
 - balcony detailing;
 - any other details required

The development shall then be carried out in accordance with the approved details and maintained as such thereafter.

Reason: In order that the Council may be satisfied as to the details of the development in the interests of the visual amenity of the area and to satisfy the requirements of policies CC1, CC2 and CC4 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

13 **Details of green roofs**

Prior to above ground works commencing, details of extensive, biodiversity roofs (with PV panels) to be delivered in accordance with section 2.2.2 of “The GRO Green Roof Code 2014” shall be submitted to and approved in writing by the Local Planning Authority.

The biodiversity roofs shall have extensive substrate base (undulating depths of 80-150mm); shall detail habitat features such as (but not limited to) gravels, sand, boulders or rocks; shall be planted/seeded with an agreed mix of species but this should be focused on wildflower planting, and shall contain no more than a maximum of 25% sedum.

Reason: In the interest of maintaining ecology and to result in a net gain in biodiversity in accordance with policies GB4 and GB7 of the Local Plan (2015) and policies G5, G6 and G7 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

14 **Details of noise protection measures**

- A. Prior to the commencement of above ground works (excluding demolition), details of mitigation measures to both private and communal outdoor amenity spaces shall be submitted to and approved in writing by the local planning authority to ensure that all occupiers should have access to amenity spaces where noise levels do not exceed 50dB LAeq,16hours.

Details shall include a number:

- ledges, local screens, parapets, canopies to private amenity spaces; and
- noise shelters within the communal outdoor amenity areas

- B. Prior to the commencement of above ground works (excluding demolition), details, details of a sound mitigation scheme designed to protect the future occupants (including sensitive internal spaces and external amenity areas) of the proposed development from noise emitted from aircraft and nearby sources shall be submitted to the Local Planning Authority and approved in writing to ensure that maximum noise levels permitted within the dwellings will not exceed those that are specified in Table 4 of British Standard 8233:2014 [Living Rooms = 35 dB LAeq, 16 hours; Dining room/area = 40 dB LAeq, 16 hours; Bedroom = 35 dB LAeq, 16 hours during day-time (07:00 - 23:00) and Bedroom = 30 dB LAeq, 8 hours during night-time (23:00 - 07:00), night-time (23:00 – 07:00) LAm_{ax} noise levels within bedrooms do not exceed 45 dB LAm_{ax} more than 10 to 15 times per night.

Such a scheme shall include details of fenestration, window and door openings, the ventilation systems, insulation, materials as well as mitigation measures for external amenity areas.

The glazing and ventilation requirements shall also be provided regarding the control of overheating within the flats. The details so approved shall be implemented before occupation.

- C. Prior to occupation, sound insulation tests shall be submitted to and approved in writing by the Local Planning Authority. Noise tests shall be carried out taking account of worst-case environmental conditions, such as easterly operations at Heathrow, peak time traffic flows wind speed. Continuous logged data shall be submitted.

The works shall be carried out in accordance with the approved plans before the dwellings are occupied and retained thereafter.

Reason: To ensure a high quality of accommodation for the future residents in accordance with policies CC1, CC2 and EQ5 of the Local Plan (2015) and policy SI1 of the London Plan (2021), coupled with the requirements of the National Planning Policy Framework 2021.

15 **Sustainable sourcing of materials**

- A. Prior to the commencement of above ground works (excluding demolition), details shall be submitted to and approved by the Local Planning Authority that demonstrate:
- At least three of the key elements of the building envelope (external walls, windows roof, upper floor slabs, internal walls, floor finishes/coverings) are to achieve a rating of A+ to D in the Building Research Establishment (BRE) The Green Guide of specification.
 - At least 50% of timber and timber products are to be sourced from accredited Forest Stewardship Council (FSC) or Programme for the Endorsement of Forestry Certification (PEFC) scheme.
- B. Prior to occupation, evidence (e.g. photographs and copies of installation contracts) shall be submitted to and approved by the Local Planning Authority to demonstrate that the development has been carried out in accordance with the approved details under Part A of this condition. The development shall be maintained in accordance with the approved details at all times thereafter.

Reason: in order to ensure the sustainable sourcing of materials in accordance with policy EQ2 of the Local Plan (2015) and policies SI2 and SI7 of the London Plan (2021) and the Mayor of London's Sustainable Design and Construction SPG coupled with the requirements of the National Planning Policy Framework 2021.

16 **Landscaping**

Prior to the commencement of above ground works and notwithstanding the submitted plans, full details of both hard and soft landscape works, including for private and communal amenity spaces, new public realm elements, the green roof and the proposed allotments, and a landscape maintenance plan for the residential component of the development, for the lifetime of the development shall be submitted to and approved in writing by the Local Planning Authority.

The works shall then be carried out as approved prior to the occupation of

the development and maintained as such at all times thereafter.

The details shall include (surface treatments to Church Walk; proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (eg. furniture, play equipment (including the location, specifications, appearance and intended age group of those facilities); defensible spaces to residential units; rear garden landscaping; allotment details; refuse or other storage units; signs; lighting (including number, location, design and light levels etc.); proposed and existing functional services above and below ground (eg drainage power, communications cables, pipelines etc. indicating lines, manholes, supports etc.); retained historic landscape features and proposals for restoration, including boundary walls, where relevant).

Details of the soft landscape works shall include (planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants (all to be native or an enhancement to nature); noting species; plant sizes (including root volumes) and proposed numbers/densities where appropriate; implementation programme).

All landscaping comprised in the approved details shall be carried out during the first planting and seeding seasons following completion of construction works and prior to occupation. Any trees or shrubs planted (including any such replacements) which die within five years from the date of planting shall be replaced in the next planting season with the same species, and of comparable maturity. All play facilities shall be installed in accordance with the approved details and made available for use prior to the occupation of any part of the development and retained as such. The development shall be carried out strictly in accordance with the details so approved and shall be maintained in accordance with the approved management programme.

Reason: To ensure a satisfactory appearance of the site and the adjacent the area, to provide satisfactory levels of play equipment and to enhance green infrastructure and biodiversity in accordance with policies SC5, CC1, CC2, CC4, GB4, GB7 and GB9 of the Local Plan (2015) and policies D4, D5, D8, S4, G1, G5, G6 and G7 of the London Plan (2021) and the Mayor of London's The Shaping Neighbourhoods: Play and Informal Recreation SPG coupled with the requirements of the National Planning Policy Framework 2021.

17 **Details of visibility splays**

Prior to the commencement of above ground works, details of the pedestrian visibility splays to the approved accesses that demonstrate a minimum of 2.4m x 2.4m are provided on either side of the accesses are to be submitted to and approved in writing by the Local Planning Authority.

The approved details shall be carried out in accordance with the approved detail and so maintained at all times.

Reason. In order to minimise danger, obstruction and inconvenience to users of the highway and of the access in accordance with policy EC2 of

the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

18 Blue badge spaces

Prior to the commencement of above ground works and notwithstanding the submitted plans, full details of four blue badge parking bays for the residential component of the development and one blue badge parking bay for the allotment component of the development shall be submitted to and approved in writing by the Local Planning Authority. The bay serving the allotments shall be further set back from the highway as part of these details.

The bays shall be installed prior to the occupation of the development and in accordance with the approved details and so maintained at all times thereafter.

Reason: In order to promote sustainable modes of transport, in accordance with policies CC1, CC2 and EC2 of the Local Plan (2015) and policies T6 and T6.1 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

19 EV charging points

Prior to the commencement of above ground works, full details of the Electric Vehicle Charging Points, each capable of a minimum output of 7.2kW, shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the number, location and manufacturer's specifications.

The charging points shall be installed in accordance with the approved details and so maintained at all times thereafter.

Reason: In order to promote sustainable modes of transport, in accordance with policies CC1, CC2 and EC2 of the Local Plan (2015) and policies T6 and T6.1 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

20 Delivery and Servicing Management Plan

Prior to occupation, a Delivery and Servicing Plan (DSP) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. The DSP shall cover as a minimum:

- Full details of the management of the bollard and the vehicles permitted to access the through route off Park Road; and
- Full details of the refuse strategy.

Reason. To ensure highway safety is maintained and preserved in accordance with policy EC2 of the Local Plan (2015), coupled with the requirements of the National Planning Policy Framework 2021.

21 Access Works

Prior to occupation and notwithstanding the submitted plans, full details of the proposed vehicular and pedestrian access, to and within the site as well as extending the footway south along the eastern side of Snowy

Fielder Way that extends outside of the site shall be submitted to and approved in writing by the Local Planning Authority. This includes, but is not exhaustive, a reduced distance for the pedestrian crossing on Park Road and details of the visibility splays for both Snowy Fielder Way and Park Road accesses.

No part of the development hereby permitted shall be occupied until the new means of the access works have been sited, laid out and constructed in accordance with the approved details.

The approved details shall be carried out in accordance with the approved detail and so maintained at all times.

Reason. In order to minimise danger, obstruction and inconvenience to users of the highway and of the access in accordance with policy EC2 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

22 **Parking provided and retained**

Prior to occupation, the vehicular access, turning areas, and parking spaces (including spaces for people with disabilities and any electric vehicle charging points approved) and the access to them hereby approved shall be provided in accordance with the scheme shown on the Ground Floor Site Plan and Zone 1 – Basement Plan (Refs: PAR-PTE-ZZ-00-DR-A-10100 P4; PAR-PTE-Z1-B1-DR-A-10099 P2) or any subsequently approved drawings (including as part of Conditions 17, 18, 19 and 21) approved in writing by the Local Planning Authority. This provision shall be permanently available for the occupiers and users of the premises and used for no other purpose.

Reason: To ensure that there are adequate servicing facilities within the site in the interests of highway safety in accordance with policy EC2 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

23 **Parking Management Plan**

Prior to occupation, a Parking Management Plan (PMP) shall be submitted to and approved in writing by the Local Planning Authority. The PMP shall include the following:

- i. details of how parking will be allocated and leased and how this will be operated and enforced;
- ii. details of measures proposed to restrict parking to designated bays only and prohibit parking on the access road;
- iii. a commitment to convert passive EV bays to active when demand requires;
- iv. a commitment to remove parking spaces when residents that have a right to park move out or their circumstances change so that they no longer need a space;
- v. measures to ensure that all future residents are informed of the PMP.

The car parking areas shall thereafter be managed in compliance with the

approved PMP.

Reason: In order to promote sustainable modes of transport and safeguard the amenities of surrounding residential properties and ensure minimal disruption of traffic in the locality, in accordance with policies CC1, CC2 and EC2 of the Local Plan (2015) and policies T4 and T6 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

24 **Cycle parking**

Prior to occupation and notwithstanding the submitted details, full details (including the number, location, the design of secure structures and manufacturer's specifications) of all cycle stands for the occupants of, and visitors to, the development shall be submitted to and approved in writing by the Local Planning Authority.

The approved facilities shall be fully implemented and made available for use before any part of the development is first occupied and thereafter retained for use at all times without obstruction.

Reason: To support sustainable transport objectives; in accordance with policy EC2 of the Local Plan (2015) and policy T5 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

25 **Secure by Design**

Prior to occupation, the development shall achieve 'Secured by Design' accreditation awarded by the Design-Out Crime Officer from the Metropolitan Police Service on behalf of the Association of Chief Police Officers (ACPO).

No dwelling shall be occupied until accreditation has been achieved and evidence of such accreditation has been submitted to and approved in writing by the Local Planning Authority.

Reason: In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well-being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 and to ensure the development provides a safe and secure environment in accordance with policy CC2 of the Local Plan (2015) and policy D11 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

26 **Energy Strategy**

- A. The development hereby permitted shall be implemented in accordance with the approved Energy Strategy.
- B. Prior to first occupation of any dwelling within the development hereby approved evidence (e.g. photographs, installation contracts and As-Built certificates under the Standard Assessment Procedure/National Calculation Method) should be submitted to the Local Planning Authority and approved in writing to show that the development has been constructed in accordance with the approved Energy Strategy, and any subsequent approved

revisions, and achieved a 78% reduction in emissions.

- C. Upon final commencement of operation of any low and zero carbon technologies, suitable devices for the monitoring of the low and zero carbon technologies shall have been installed, and the monitored data shall be submitted automatically to a monitoring web-platform at daily intervals for a period of three years from the point of full operation.

Reason: To ensure that the development makes the fullest contribution to minimising carbon dioxide emissions in accordance with policies CC2 and EQ1 of the Local Plan (2015) and policies SI2 and SI4 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

27 Internal water use

Prior to first occupation, evidence (schedule of installed fittings and manufactures literature) shall be submitted to and approved in writing by the Local Planning Authority to demonstrate that the development has achieved an internal water use of 105L/person/day or less (plus 5 litres for outside use) in line with the Water Efficiency Calculator for new dwellings from the Department of Communities and Local Government. Measures integrated shall be retained for the lifetime of the development.

Reason: in order to protect and conserve water supplies and resources and in the interest of sustainable development in accordance with policy EQ2 of the Local Plan (2015) and policy SI5 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

28 Dewatering Methodology (Natural England)

During the course of the development, the Local Planning Authority shall be notified immediately if higher volumes of groundwater are encountered during basement excavations. A competent person shall assess the higher volumes of groundwater, shall consult with Natural England and submit appropriate amendments to the dewatering methodology in writing to the Local Planning Authority for approval in writing before any work on that aspect of development continues.

Reason: In order to protect features of special interest for which Syon Park SSSI is notified and in the interest of maintaining ecology in accordance with policies GB4 and GB7 of the Local Plan (2015) and policies G5, G6 and G7 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021 and under the Wildlife and Countryside Act 1981.

29 Hours of construction

No demolition or construction work shall take place on the site except between the hours of 8:00am to 6:00pm on Mondays to Friday and 8:00am to 1:00pm on Saturdays and none shall take place on Sundays and Public Holidays without the prior agreement of the Local Planning Authority.

Daytime works will not exceed 75 dB LAeq,T at the worst-affected

residential property during the above time periods.

Reason: To ensure that the proposed development does not prejudice the amenities of the locality in accordance with policies CC1, CC2 and EQ5 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

30 **Fixed plant noise restriction**

The design and installation of any fixed plant serving the development shall not exceed cumulative rating levels (LAR^rTr) of at least 10dB below the background noise level LA_{90,T} when measured or predicted at 1m from the facade of the nearest noise sensitive premises. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound.'

Prior to occupation and upon installation of the proposed fixed plant and any associated mitigation, an acoustic commissioning survey will be undertaken. The cumulative measured or calculated Rating Level of noise emitted from all mechanical services plant including heating, ventilation and air conditioning (HVAC) shall be 10dB(A) below the existing background noise level, at all times that the mechanical system etc operates. The measured or calculated noise levels shall be determined at the boundary of the nearest ground floor noise sensitive premises or 1 meter from the façade of the nearest first floor (or higher) noise sensitive premises, and in accordance to the latest revision of British Standard 4142.

Reason: To ensure that the future occupants of the development do not suffer an unreasonable level of noise and disturbance in accordance with policy EQ5 of the Local Plan (2015) and policy D14 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

31 **Air Quality – NRMM**

All Non-road Mobile Machinery (NRMM) used during the course of the development that is within the scope of the GLA 'Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (SPG) dated July 2014, or any successor document, shall comply with the emissions requirements therein.

Reason: In the interests of air quality in accordance with policy EQ4 of the Local Plan (2015) and policy S11 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

32 **Tree retention**

In this condition 'retained tree' means any existing tree which is to be retained in accordance with the approved plans and particulars, and paragraphs (a) and (b) below shall have effect until the expiration of five years from the date of the occupation of any of the buildings hereby approved.

- a) No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the prior written approval of the Local Planning Authority. Any topping or lopping approved shall be carried out in accordance with British Standard 3998 (Tree Work) or any other BS replacing this.
- b) If any retained tree is removed, uprooted or destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.
- c) The erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved plans and arboricultural report and particulars before any equipment, machinery or materials are brought onto the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the prior written approval of the Local Planning Authority.

Reason: To enable the Local Planning Authority to ensure the protection of retained trees from damage, in the interests of visual amenity, in accordance with policies CC1, CC2 and GB7 of the Local Plan (2015) and policy G7 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

33 Timing of vegetation clearance (breeding birds)

All removal of trees, hedgerows, shrubs, scrub or tall herbaceous vegetation shall be undertaken between September and February inclusive. If this is not possible then a suitably qualified ecologist shall check the areas concerned immediately prior to the clearance works to ensure that no nesting or nest-building birds are present. If any nesting birds are present then the vegetation shall not be removed until the fledglings have left the nest.

Reason: All wild birds, their nests and young are protected during the nesting period under The Wildlife and Countryside Act 1981 (as amended). In the interests of nature conservation and biodiversity, in accordance with policy GB7 of the Local Plan (2015) and policy G6 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

34 Ecological watching Brief

All removal of woodland or scrub shall be carried out in the reptile active season and under an Ecological Watching Brief prepared by a suitably qualified ecologist.

Reason: To ensure reptiles are protected during their hibernation period in the interests of nature conservation and biodiversity in accordance with

policy GB7 of the Local Plan (2015) and policy G6 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

35 Restriction of Permitted Development Rights

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development Order) 1995 (or any order revoking or re-enacting that order) no enlargement of the premises or any additional structures/buildings within the curtilage of the site shall be carried out.

Reason: In order not to prejudice the amenities of the adjoining properties and in order that the Local Planning Authority is able to exercise control over future development of the site in accordance with policies CC2 and CC4 of the Local Plan (2015) and policy D6 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

36 No use as a roof terrace

The roof areas of the development hereby permitted shall not be used as a balcony, roof garden or similar amenity area and, furthermore, no balustrades, railings or other means of enclosure or means of permanent access shall be erected on these areas.

Reason: To control overlooking and noise disturbance and safeguard the privacy and amenities of neighbours in accordance with policy CC2 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

37 No structures on the roof

No water tanks, plant, lift rooms or other structures shall be erected upon the roof of the approved building other than what is shown on the approved drawings.

Reason: To control the appearance of the building and safeguard the appearance of the area and to protect the amenities of neighbours, in accordance with policies CC1, CC2 and CC4 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

38 Roof paraphernalia restrictions

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking, amending or re-enacting that Order) no satellite dishes, telecommunications masts, antennas or equipment or associated structures, shall be installed on the building hereby approved without written approval from the Local Planning Authority.

Reason: To protect the appearance of the building, and accord with policies CC1, CC2 and CC4 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

39 Elevation paraphernalia restrictions

No pipes, flues, lighting equipment, or awnings, other than those shown on the approved plans shall be fixed on any elevation of any building

without the prior written approval of the local planning authority.

Reason: To protect the appearance of the building, and accord with policies CC1, CC2 and CC4 of the Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

Informatives:

- 1) To assist applicants, the London Borough of Hounslow has produced planning policies and written guidance, all of which is available on the Council's website and which has been followed in this instance. The decision was made in a timely manner.
- 2) Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
- 3) Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf>)
- 4) Although it is not anticipated that the use of a crane at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or Radar; if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane.

- 5) Please read the Thames Water guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7Cplanning.comments%40hounslow.gov.uk%7Cf6bb0df79ff4476586cf08d8b60fea1f%7C5b62666662464c9bacc7716a5a94bd03%7C0%7C0%7C637459526750647668%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=EBWYRe5RBcWnnWOfXbHpknv4aGr0htchtuoeh%2BCPE%3D&reserved=0> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm)
- 6) There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.
- 7) Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>
- 8) The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm)
- 9) A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be

directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

- 10) There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7Cplanning.comments%40hounslow.gov.uk%7Cf6bb0df79ff4476586cf08d8b60fea1f%7C5b62666662464c9bacc7716a5a94bd03%7C0%7C0%7C637459526750647668%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=EBWYRe5RBcWnnWOfXbHpknvV4aGr0ohtchtuoeh%2BCPE%3D&reserved=0>
- 11) The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7Cplanning.comments%40hounslow.gov.uk%7Cf6bb0df79ff4476586cf08d8b60fea1f%7C5b62666662464c9bacc7716a5a94bd03%7C0%7C0%7C637459526750652641%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=j0VDedT2Z0kTrnqjgc6zgvDWSnRLnl%2F3LN1DwyxXOSs%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk
- 12) Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 13) Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective

use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

- 14) Cadent have identified operational gas apparatus within the application site boundary. This may include a legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent assets in private land. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained from the landowner in the first instance. If buildings or structures are proposed directly above the gas apparatus then development should only take place following a diversion of this apparatus. The Applicant should contact Cadent's Plant Protection Team at the earliest opportunity to discuss proposed diversions of apparatus to avoid any unnecessary delays. If any construction traffic is likely to cross a Cadent pipeline then the Applicant must contact Cadent's Plant Protection Team to see if any protection measures are required. All developers are required to contact Cadent's Plant Protection Team for approval before carrying out any works on site and ensuring requirements are adhered to. Email: plantprotection@cadentgas.com Tel: 0800 688 588

Drawing numbers

Drawings:

Received 24/09/2021:

PAR-PTE-ZZ-ZZ-DR-A -10001-P1; PAR-PTE-ZZ-ZZ-DR-A -10002-P1; PAR-PTE-ZZ-ZZ-DR-A -10005-P1; PAR-PTE-ZZ-ZZ-DR-A -10006-P1; PAR-PTE-ZZ-00-DR-A-10100-P4; PAR-PTE-ZZ-RF-DR-A-10104-P3; PAR-PTE-Z1-00-DR-A-10100-P3; PAR-PTE-Z1-01-DR-A-10101-P2; PAR-PTE-Z1-02-DR-A-10102-P2; PAR-PTE-Z1-03-DR-A-10103-P3; PAR-PTE-Z1-B1-DR-A-10099-P2; PAR-PTE-Z2-00-DR-A-10100-P4; PAR-PTE-Z2-ZZ-DR-A-10101-P1; PAR-PTE-Z2-ZZ-DR-A-10101-P1; PAR-PTE-ZZ-ZZ-DR-A-10201-P1; PAR-PTE-ZZ-ZZ-DR-A-10300-P4; PAR-PTE-ZZ-ZZ-DR-A-10305-P1; PAR-PTE-ZZ-ZZ-DR-A-10306-P3; PAR-PTE-VE-ZZ-DR-A-10307-P4; PAR-PTE-VG-ZZ-DR-A-10308-P3; PAR-PTE-ZZ-ZZ-DR-A-10315-P1; PAR-PTE-ZZ-ZZ-DR-A-10316-P1; PAR-PTE-VE-ZZ-DR-A-10317-P3; PAR-PTE-VF-ZZ-DR-A-10318-P1; PAR-PTE-ZZ-ZZ-DR-A-10319-P1; PAR-PTE-ZZ-ZZ-DR-A-10320-P1; PAR-PTE-ZZ-ZZ-DR-A-10401-P1; PAR-PTE-ZZ-ZZ-DR-A-10402-P1; PAR-PTE-ZZ-ZZ-DR-A-10403-P1; PAR-PTE-ZZ-ZZ-DR-A-10404-P2; 766-FH-XX-00-DP-L-101-P3.

Received: 09/09/2021:

PAR-PTE-ZZ-ZZ-DR-A-10701-P1; PAR-PTE-ZZ-XX-SH-A-99600 Rev E

Documents:

Design and Access Statement (Produced by Pollard Thomas Edwards; dated November 2020); Design and Access Statement: Playspace Addendum (Produced by Pollard Thomas Edwards; received 21/09/2021); Additional tree information (received: 01/10/2021); Flood Risk Assessment & SuDS Strategy

Report Rev 05 (Produced by Heyne Tillett Steel; Dated: September 2021); Air Quality Assessment (Ref: P9214J704b Rev v3.0; Produced by Jomas Associates Ltd; dated 27/09/2021); Energy and Sustainability Statement Rev C (Produced by Etude; dated September 2021); Feasibility Cost Estimate Rev G (Produced by CSA; dated 23/12/2020); Statement from Northumberland Estates (received 21/09/2021); Daylight, Sunlight and Overshadowing Assessment Report (Ref: 62429/01/TRL/BK; produced by Lichfields; received 14/09/2021); Acoustic Note AP02.ad.103092A (Produced by Acoustics Plus; dated 16/06/2021); Transport Note (Produced by Caneparo Associates; received 03/06/2021); Outline Construction Logistics Plan (Produced by Caneparo Associates, dated November 2020); Urban Greening Factor (Produced by Farrer Huxley; dated December 2020); Health Impact Assessment (Produced by Lichfields; dated 03/12/2020); Heritage, Townscape and Visual Impact Assessment (Produced by Lichfields; dated December 2020); Statement of Community Involvement (Produced by Lichfields; Dated December 2020); GLA Carbon Emission Reporting Spreadsheet (received 16/12/2020); A Written Scheme of Investigation for an Archaeological Evaluation (Produced by AOC Archaeology Group; dated September 2016); Arboricultural Impact Assessment and Method Statement Rev B (Produced by Greenspace Ecological Solutions; Dated November 2020); Construction Method Statement (Produced by Blue Sky Building; Dated November 2020); Geo-Environmental & Geotechnical Assessment Report (Produced by Jomas Associates; Dated 13/11/2020); Historic environment assessment (Produced by Mola; Dated November 2020); Residential Travel Plan (Produced by Caneparo Associates; Dated November 2020); Archaeological Evaluation Report (Produced by AOC Archaeology Group; dated October 2016); Ecological Impact Assessment (Produced by Ecosa Ltd; Dated December 2020); Delivery and Servicing Plan (Produced by Caneparo Associates; Dated November 2020); Planning Statement (Produced by Lichfields; dated December 2020); Transport Assessment (Produced by Caneparo Associates; Dated December 2020); Financial Viability Assessment Report (Produced by Savills; Dated August 2021).

PLANNING COMMITTEE
THURSDAY, 14 OCTOBER 2021

LATE REPORT

The following report was received too late to be included on the main agenda for this meeting and was marked "*An Addendum Report will be produced the day before the meeting date, with any additional information.*". It is now enclosed, as follows:

7. Addendum Report

(Pages 2 - 7)

MEMBERSHIP

Councillor Corinna Smart- Chair

Councillors Harleen Atwal Hear, Samia Chaudhary, Mel Collins, Michael Denniss, Richard Foote, Ajmer Grewal, Shivraj Grewal, Vickram Grewal, Guy Lambert, Tony Louki, Alan Mitchell, Balraj Sarai, Raghwinder Siddhu and John Todd.

13 October 2021

If you require further information about this agenda please contact: Wendy Merry on 020 8583 2061 or wendy.merry@hounslow.gov.uk.

PLANNING COMMITTEE
14 October 2021

ADDENDUM REPORT

This report contains additional information relating to agenda items not available at the time of publication of the main agenda.

Agenda Item 6 – 379-389 Staines Road, Hounslow (Pages 126-168)

Page 163 additional condition:

27. Air Quality – NRMM All Non-road Mobile Machinery (NRMM) used during the course of the development that is within the scope of the GLA ‘Control of Dust and Emissions during Construction and Demolition’ Supplementary Planning Guidance (SPG) dated July 2014, or any successor document, shall comply with the emissions requirements therein.

Reason: In the interests of air quality in accordance with policy EQ4 of the Local Plan (2015) and policy S11 of the London Plan (2021) coupled with the requirements of the National Planning Policy Framework 2021.

Agenda Item 4 – Park Road Allotments, Park Road, Isleworth, London (Pages 9-104)

Paragraph 7.226 - Correction: This paragraph should read:

The proposed landscaping along Park Road appears to overlap onto the public highway. This would not be acceptable. However, this can be rectified through the recommended landscaping condition (16) so that all of the landscaping is clear of the public highway. A slither (approximately 11m long and 1m wide) of the northernmost block would be built upon highway land adjacent to Snowy Fielder Way. Given the wide highway verge at this point (approximately 12m wide) this is not objectionable. However, this would require the area to be Stopped Up to remove its status as public highway and would be secured through a separate legal process.

Paragraph 7.263 - Correction: This paragraph should read:

The SuDS report states that below ground attenuation tanks, tree pits, rain gardens and permeable paving would be incorporated within the development. The SuDS report has also been revised following initial concerns from the LLFA. The LLFA is satisfied that appropriate full details and detailed drainage designs can be secured by condition (10), including addressing the drainage calculations, the drainage hierarchy and in particular rainwater harvesting. This condition would also require evidence to demonstrate the development is carried out in accordance with the final approved details.

Paragraph 7.299 – Correction to Carbon Offset Fund Contribution, which should read:

- Carbon Offset Fund Contribution £61,275

Condition 2 – amended to read:

In accordance with approved drawings

The proposed development shall be carried out in all respects in accordance with the proposals contained in this application and the plans submitted:

Drawings:

Received 24/09/2021:

PAR-PTE-ZZ-ZZ-DR-A -10001-P1; PAR-PTE-ZZ-ZZ-DR-A -10002-P1; PAR-PTE-ZZ-ZZ-DR-A -10005-P1; PAR-PTE-ZZ-ZZ-DR-A -10006-P1; PAR-PTE-ZZ-00-DR-A-10100-P4; PAR-PTE-ZZ-RF-DR-A-10104-P3; PAR-PTE-Z1-00-DR-A-10100-P3; PAR-PTE-Z1-01-DR-A-10101-P2; PAR-PTE-Z1-02-DR-A-10102-P2; PAR-PTE-Z1-03-DR-A-10103-P3; PAR-PTE-Z1-B1-DR-A-10099-P2; PAR-PTE-Z2-00-DR-A-10100-P4; PAR-PTE-Z2-ZZ-DR-A-10101-P1; PAR-PTE-Z2-ZZ-DR-A-10200-P2; PAR-PTE-ZZ-ZZ-DR-A-10201-P1; PAR-PTE-ZZ-ZZ-DR-A-10300-P4; PAR-PTE-ZZ-ZZ-DR-A-10305-P1; PAR-PTE-ZZ-ZZ-DR-A-10306-P3; PAR-PTE-VE-ZZ-DR-A-10307-P4; PAR-PTE-VG-ZZ-DR-A-10308-P3; PAR-PTE-ZZ-ZZ-DR-A-10315-P1; PAR-PTE-ZZ-ZZ-DR-A-10316-P1; PAR-PTE-VE-ZZ-DR-A-10317-P3; PAR-PTE-VF-ZZ-DR-A-10318-P1; PAR-PTE-ZZ-ZZ-DR-A-10319-P1; PAR-PTE-ZZ-ZZ-DR-A-10320-P1; PAR-PTE-ZZ-ZZ-DR-A-10401-P1; PAR-PTE-ZZ-ZZ-DR-A-10402-P1; PAR-PTE-ZZ-ZZ-DR-A-10403-P1; PAR-PTE-ZZ-ZZ-DR-A-10404-P2; 766-FH-XX-00-DP-L-101-P3.

Received: 09/09/2021:

PAR-PTE-ZZ-ZZ-DR-A-10701-P1; PAR-PTE-ZZ-XX-SH-A-99600 Rev E

Documents:

Design and Access Statement (Produced by Pollard Thomas Edwards; dated November 2020); Design and Access Statement: Playspace Addendum (Produced by Pollard Thomas Edwards; received 21/09/2021); Additional tree information (received: 01/10/2021); Flood Risk Assessment & SuDS Strategy Report Rev 05 (Produced by Heyne Tillett Steel; Dated: September 2021); Air Quality Assessment (Ref: P9214J704b Rev v3.0; Produced by Jomas Associates Ltd; dated 27/09/2021); Energy and Sustainability Statement Rev C (Produced by Etude; dated September 2021); Feasibility Cost Estimate Rev G (Produced by CSA; dated 23/12/2020); Statement from Northumberland Estates (received 21/09/2021); Daylight, Sunlight and Overshadowing Assessment Report (Ref: 62429/01/TRL/BK; produced by Lichfields; received 14/09/2021); Acoustic Note AP02.ad.103092A (Produced by

Acoustics Plus; dated 16/06/2021); Transport Note (Produced by Caneparo Associates; received 03/06/2021); Outline Construction Logistics Plan (Produced by Caneparo Associates, dated November 2020); Urban Greening Factor (Produced by Farrer Huxley; dated December 2020); Health Impact Assessment (Produced by Lichfields; dated 03/12/2020); Heritage, Townscape and Visual Impact Assessment (Produced by Lichfields; dated December 2020); Statement of Community Involvement (Produced by Lichfields; Dated December 2020); GLA Carbon Emission Reporting Spreadsheet (received 16/12/2020); A Written Scheme of Investigation for an Archaeological Evaluation (Produced by AOC Archaeology Group; dated September 2016); Arboricultural Impact Assessment and Method Statement Rev B (Produced by Greenspace Ecological Solutions; Dated November 2020); Construction Method Statement (Produced by Blue Sky Building; Dated November 2020); Geo-Environmental & Geotechnical Assessment Report (Produced by Jomas Associates; Dated 13/11/2020); Historic environment assessment (Produced by Mola; Dated November 2020); Residential Travel Plan (Produced by Caneparo Associates; Dated November 2020); Archaeological Evaluation Report (Produced by AOC Archaeology Group; dated October 2016); Ecological Impact Assessment (Produced by Ecosa Ltd; Dated December 2020); Delivery and Servicing Plan (Produced by Caneparo Associates; Dated November 2020); Planning Statement (Produced by Lichfields; dated December 2020); Transport Assessment (Produced by Caneparo Associates; Dated December 2020); Financial Viability Assessment Report (Produced by Savills; Dated August 2021).

Reason: To ensure the development is carried out in accordance with the planning permission, a satisfactory standard of development is secured and to allow the local planning authority to review any potential changes to the scheme.

Condition 7 – amended to read:

Contamination

Prior to the commencement of development, including any demolition works:

- A. Details of further intrusive site investigation are required in addition to the phase 1 desk study and phase 2 intrusive investigation previously submitted. These details shall be submitted to, and approved in writing by, the Local Planning Authority. The site shall be investigated by a competent person to identify the extent and nature of contamination. The report should include a tiered risk assessment of the contamination based on the proposed end use of the site. Additional investigation may be required where it is deemed necessary.
- B. If required, a scheme for decontamination of the site shall be submitted to the Local Planning Authority, for written approval. The scheme shall account for any comments made by the Local Planning Authority before the development hereby permitted is first occupied.

During the course of the development:

- C. The Local Planning Authority shall be notified immediately if additional contamination is discovered during the course of the development. A competent person shall assess the additional contamination, and shall submit appropriate amendments to the scheme for decontamination in writing to the Local Planning Authority for approval before any work on that aspect of development continues.

Before the development is first brought into use:

- D. The agreed scheme for decontamination referred to in clauses b) and c) above, including amendments, shall be fully implemented and a written validation (closure) report submitted to the Local Planning Authority for approval.

Reason: Contamination is known or suspected on the site due to a former land use. The LPA therefore wishes to ensure that the development can be implemented and occupied with adequate regard for public and environmental safety, in accordance with policy EQ8 of the adopted Local Plan (2015) coupled with the requirements of the National Planning Policy Framework 2021.

Supporting notes:

- a) An initial phase 1 desk study and a Phase 2 intrusive investigation have been submitted with the original application and is considered satisfactory.
- b) The scheme for decontamination shall provide details of how each potential pollutant linkage, as identified in the conceptual model, will be made safe.
- c) In some instances the LPA may require work on site to be ceased whilst the nature of additional contamination is investigated fully.
- d) The validation report shall revisit the site conceptual model, and provide evidence that each aspect of the decontamination scheme was carried out correctly and successfully. This report shall prove that the development is suitable for its new use.
- e) We request that site investigation reports or site plans be sent electronically to landquality@hounslow.gov.uk or by post on a cd or dvd wherever possible.

Condition 10 – amended to read:

Drainage Strategy

- A. Notwithstanding the approved details, development shall not be commenced unless and until a final and revised drainage strategy that includes a detailed drainage design incorporating drawings and supporting calculations and an updated Drainage Assessment Form that aligns with the approved drawings has been submitted to and approved in writing by the Local Planning Authority

in consultation with the Lead Local Flood Authority. It should be shown that drainage calculations, rainwater harvesting techniques and green infrastructure have been considered within the design. Proposed runoff rates from the site must be no more than three times the greenfield runoff rate. It should be shown that on-site flow as a result of the 1 in 100 year event with a climate change consideration are suitably managed. A detailed management plan confirming routine maintenance tasks for all drainage components and the company responsible for ownership of these maintenance tasks must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.

- B. No building hereby permitted shall be occupied until evidence (photographs and installation contracts) is submitted to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all of the proposed drainage components.

Reason: To prevent the risk of flooding to and from the site in accordance with relevant policy requirements including but not limited to London Plan (2021) policies S112 and S113 and the Non-Statutory Technical Standards for Sustainable Drainage Systems and Local Plan (2015) policy EQ3 coupled with the requirements of the National Planning Policy Framework 2021.

Additional representations

Further representations have been received by amenity groups and individuals and have been summarised below:

The Isleworth Society: - Objection

- The previous application was dismissed at appeal on the grounds of loss of Local Open Space
- Loss of allotments
- Loss of biodiversity
- Would harm the character and appearance of the conservation area
- Would result in flooding
- The proposal would not be able to fund the repair works to Syon House and Park as the financial viability assessment concludes the development would be in deficit
- The proposed level of affordable housing does not meet the strategic target of 50%

13 additional representations from individuals have been received. All 14 object:

- The previous application was dismissed at appeal on the grounds of loss of Local Open Space
- Loss of allotments
- Loss of an Asset of Community Value
- Loss of biodiversity
- Would harm the character and appearance of the conservation area
- Would result in flooding
- The proposal would not be able to fund the repair works to Syon House and Park as the financial viability assessment concludes the development would be in deficit
- Hounslow is meeting its housing targets and therefore the proposal is surplus to requirements
- The proposal would impact upon existing infrastructure, including traffic

Agenda Item 5 – Unit 1 Challenge Road, Feltham (Pages 105-124)

Drawing number MK/CL/2021/2 is being replaced with drawing number MK/CL/2021/2 RevA in condition 2. The agent has provided an updated existing site block plan showing the configuration of on-site parking, which was omitted from the original existing site block plan.

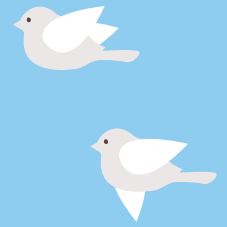
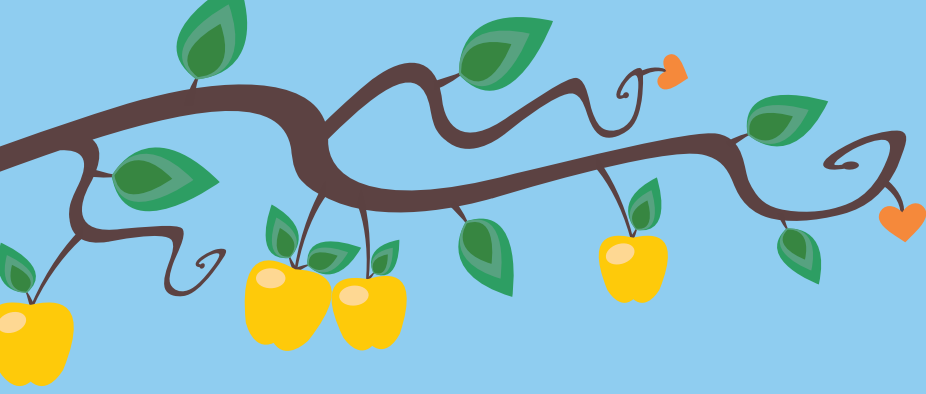
Additional representation

A further representation has been received and has been summarised below:

- Increase in use of building would result in an increase in traffic
- Noise from Unit 1 and the rest of the trading estate is not monitored by Council
- The application is not thought to comply with Local Plan policies
- Businesses in Challenge Road are constantly seeking to change the conditions previously agreed to in order to protect residents

These concerns have been considered in the body of the assessment report.

Appendix 4 Hounslow Allotment Strategy 2020-2025



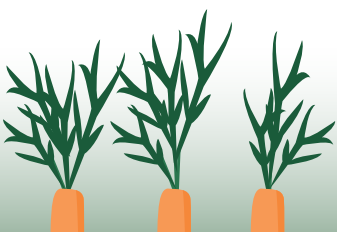
Hounslow's ALLOTMENTS STRATEGY

2020 – 2025



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FOREWORD

Hounslow has 29 managed allotment sites, most at full capacity with around 2000 plots and considerable waiting lists and yet interest about allotments amongst our residents is growing.

Allotments are important recreational facilities and they contribute directly to the cultural development of the Borough. The recently adopted Corporate Plan recognises the value that cultural activities bring to the community through improving the quality of life for local people and how culture can assist Hounslow Council in delivering our objectives and achieve desired outcomes.

The Council have approved the Greener Borough Framework 2020-30 which seeks to provide a high-level framework to deliver on the Council's ambition and aspirations for the borough through enhancing our environment and improving sustainability. It's focus is on enhancing biodiversity, physical and mental well-being and promoting the positive effect the environment has on individuals' sense of well-being, whilst building greater civic pride.

During 2019 the London Borough of Hounslow implemented an essential review of its Allotment Sites, exploring customer demand, allotment usage opportunities and taking on board views of our current customers on the safety, security and management of our allotments. The information from this review will assist us in our goal of creating a high quality, responsive allotment service for the 21st century for the benefit of all our communities.

Pressure on the land resource in Hounslow and across London for housing and other development is well known. Allotments are another essential green infrastructure and London Borough of Hounslow has shaped a strong vision in continuing to value allotments and improve its service and offer for generations to come. This plan highlights the key challenges and opportunities that we will need to overcome and exploit, shaping an improved and modernised service to be developed in next five years. I look forward to working with all our partners and communities that share our vision for Hounslow's allotments.



Councillor Samia Chaudhary
Cabinet Member for Leisure

1. INTRODUCTION

Cultivating an allotment plot is not just a great recreational pursuit but an active, socially inclusive, environmentally sustainable lifestyle.

Allotments promote a variety of benefits including:

- Enhancing peoples physical and mental well-being
- Protecting and enhancing local biodiversity
- Improving local neighbourhood and social cohesion
- Providing opportunities for lifelong learning
- Contributing to social and economic regeneration.

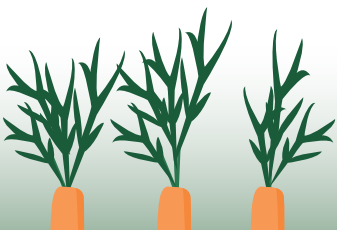
The provision of allotments, by local authorities is a statutory duty. The principal legislation is listed in Appendix 1. The London Borough of Hounslow will continue to promote and enhance allotments by facilitating partnerships with public, private and voluntary sectors to make a valuable contribution to the borough's sustainability and community offering. Developers can explore ways to incorporate allotments into their plans so they can be part of the wider regeneration offers, creating access to gardening spaces that can be accessible for people in flats.

2. STRATEGIC CONTEXT

The development of Allotments are a vital component of the Council's Corporate Plan as green infrastructure, by contributing to the commitments of "Residents are healthy, active and socially connected" and "People live in pleasant neighbourhoods".

Allotments also play an important role in the approach highlighted in the Council's Joint Health and Wellbeing strategy with start, live and age well and preventing ill-health, which in turn has an impact on reducing costs within the wider economy, the council and the NHS. Other relevant local, regional and national strategies are as follows:

- The Greener Borough Framework and Climate Emergency Action Plan 2020-30 which seeks to provide a high-level framework to deliver on the council's ambition on sustainability tackling climate change
- The Borough's Local Plan 2015-2030 including objectives and a range of planning policies relevant to allotments.





- The regional strategic plans including the All London green grid, recognising allotments as London's important productive landscapes, and Natural Capital, Investing in Green Infrastructure for a Future London (GLA)
- Policies aligned with the National Allotment Society and participating to the London Mayor's national park city campaign.
- Best practice guidance included according to the publication from the Local Government Association (LGA) "Growing in the community- 2nd edition"
- The DEFRA 25 year plan to improve the environment, improving the environment and working with communities and businesses to do this.

3. ALLOTMENTS IN THE UK

The Association of Public Services Excellence (APSE) state of the market 2018 reflected Hounslow's position in relation to the popularity of allotments and current challenges. With a survey of over 140 Local authorities, demand for allotments seems to increase everywhere, with waiting lists high and a average waiting time of 18 months.

Allotments are heavily subsidised in the majority of the cases and in light of financial pressures, many allotment sites are now moving to self management models, often with the continuing support of the local authority. In this way allotment holders can not only ensure what finance is available is used to meet the known needs of the site, but they are also able to apply for funding which is not available to local authorities. Fees and charges vary, with most Authorities charging over £70 per year per plot. The current charges in Hounslow are £71 per plot.

Many Authorities are now building the importance of allotments into their Health and Well-Being Strategies and also their Local Development Plans. This latter point is evident within the APSE survey where many have reported they are using new developments to provide additional allotment sites.

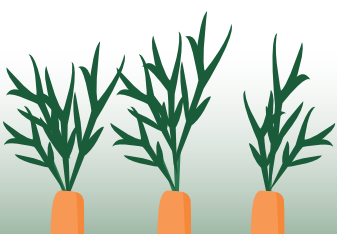
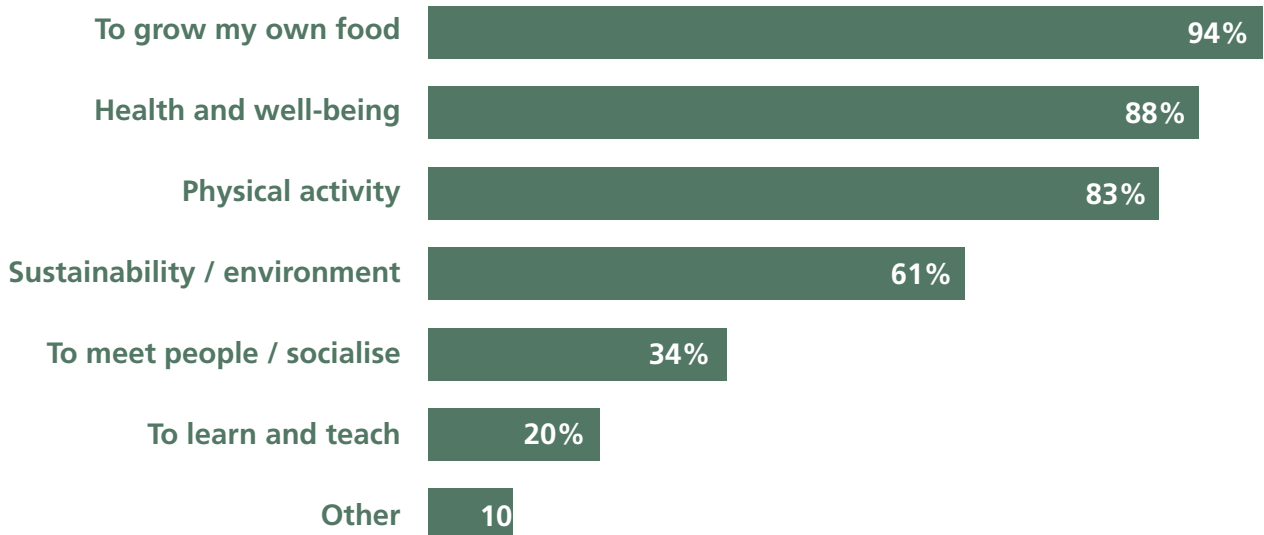
With regards to the environment and the pressure of climate change and sustainability, 100.0% of respondents stated that environmental sustainability is important in site management particularly by adopting water-saving measures such as water butts (97%), 53% stated that they cultivate plots organically and almost 20% of allotment sites have begun to use solar power instead of mains power.

In general, Local Authorities recognise the multiple benefits allotments can bring, allotments are acknowledged as being a key community asset and one which local residents, allotment holders and agencies across the country are increasingly helping to sustain.

4. ALLOTMENTS IN HOUNSLOW

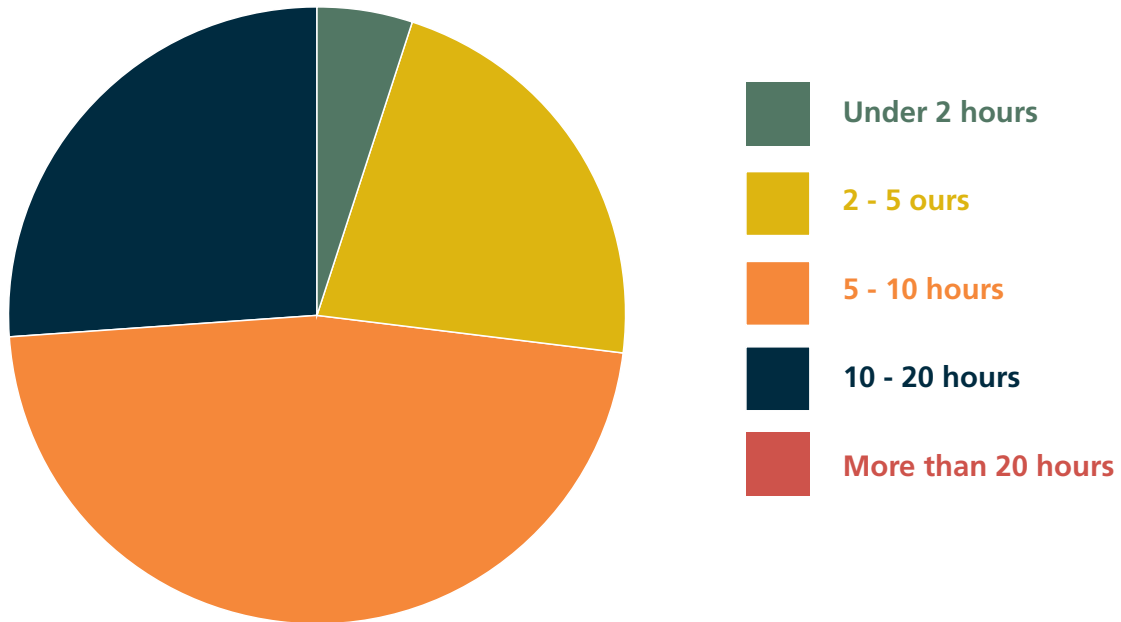


Our residents said: Reasons to have an allotment:





Time spent on allotment per week



Age profile

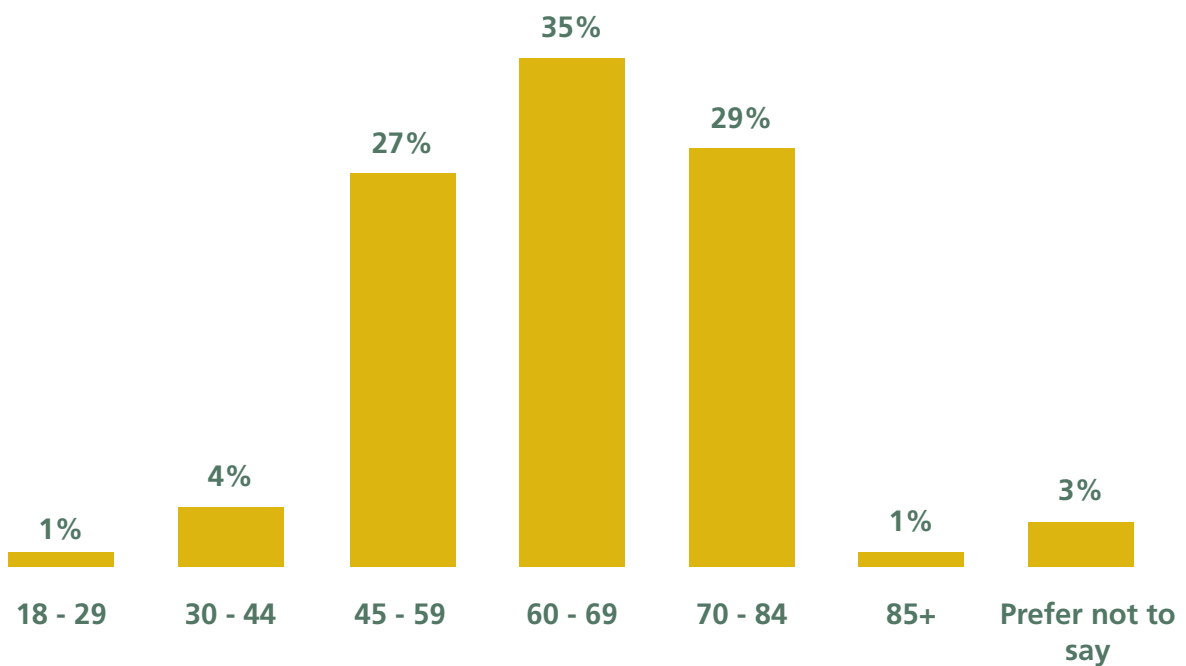




Table 1 shows the total provision of actively managed allotments and community gardens in each Area. The general provision in Hounslow seems to be adequate for the total number of households. However, the local provision in Hounslow at area level shows overprovision in some areas and under provision in others. Feltham West, Heston West, Hounslow Heath and Hounslow West currently have no allotment provision. Syon and Turnham green are low. Bedfont, Hanworth, Heston central, Hounslow South and Chiswick Homefields have the highest provision per 1,000 households.

Area	Allotment area in ha	No. of Households (2019) GIS	Provision / ha per 1,000 households	Total Plots	Plots per 1000 households
Bedfont	5.85	5,173	1.13	190	37
Brentford	2.94	8,056	0.36	70	9
Chiswick Homefields	8.23	5,224	1.58	473	91
Chiswick Riverside	3.29	5,342	0.62	143	27
Cranford	2.53	4,427	0.57	25	6
Feltham North	2.94	4,465	0.66	75	17
Feltham West	0.00	5,898	0.00	0	0
Hanworth	5.16	4,900	1.05	171	35
Hanworth Park	3.73	4,959	0.75	104	21
Heston Central	3.93	4,278	0.92	130	30
Heston East	1.59	4,350	0.36	34	8
Heston West	0.00	4,304	0.00	0	0
Hounslow Central	4.39	7,014	0.63	180	26
Hounslow Heath	0.00	5,333	0.00	0	0
Hounslow South	3.91	4,147	0.94	152	37
Hounslow West	0.00	5,103	0.00	0	0
Isleworth	4.21	5,420	0.78	150	28
Osterley and Spring Grove	0.36	5,237	0.07	12	2
Syon	0.56	6,968	0.08	9	1
Turnham Green	0.20	5,870	0.03	4	1
Totals	53.81	106,468	10.53	1922	18

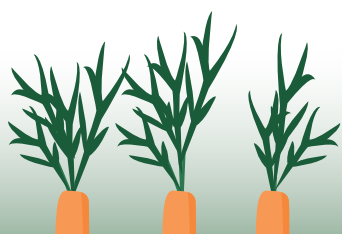
Table 2 provides a breakdown on vacancy and waiting lists within the borough. In a number of instances waiting lists are showing at sites recording vacant plots. This can be due to a time lag between individual plots becoming available and occupied by those on waiting lists.

As of January 2020, there were 681 people on a waiting list for an allotment within the borough while 169 vacant plots have been recorded.

The vacant plots figure is constantly changing as there needs to be sometime between the plot becoming vacant and its reallocation. Some of the plots might need considerable work before being returned to cultivation with a recognition this process need to be speedier.

These figures suggest that in general there is limited capacity at existing allotment sites as current waiting list vastly exceeds the vacant plots.

Site	Plots	Tenanted	Vacant	Waiting list
Barnes Farm	34	29	5	16
Burial Ground	75	74	1	25
Chertsey Road	137	137	0	45
Church Road	165	149	16	9
Church Walk	9	9	0	19
Cole Park	150	140	10	53
Dukes Meadows	203	203	0	68
Faggs Road South	27	24	3	8
Faggs Road North*	30	0	0	0
Fernside Avenue	34	15	19	19
Gainsborough Gdns	47	42	5	16
Hatton Road	190	175	15	57
Hounslow Avenue	86	82	4	30
Inwood Road	29	24	5	14
Manor Gardens	4	4	0	3
Pear Tree	34	34	0	11
Saxon Avenue	6	6	0	6





Site	Plots	Tenanted	Vacant	Waiting list
Snakey Lane	70	63	7	22
Stanley Road	117	71	46	37
Staveley Road	34	34	0	23
Sutton Lane	68	68	0	25
Syon Park Gardens	12	12	0	22
Thames Road	34	34	0	23
The Promenade	133	128	5	41
Viola Avenue	18	16	2	11
Waye Avenue	25	25	0	9
Wellmeadow Road	70	60	10	19
Westbrook Road	62	56	6	24
Worton Road	19	9	10	19
Totals	1922	1723	169	681

*Faggs road north has capacity for 30 plots but at present these plots are not ready for cultivation and not available. A substantial capital investment and use of heavy machinery is needed to bring these plots up to standard.

In Hounslow there are also active community gardens, one is the Salopian garden managed by Cultivate London in Isleworth and a proposed community garden at Sutton Playing fields currently proposed by Heston Action Group.

6. DEMAND

Influences on potential demand include demographic characteristics, accessibility and availability of allotment quality and standard allotment management, public awareness and extent of allotment promotion and potential changes in demand resulting from diversification in allotment usage to foster cultivation.

The extent of unfulfilled demand needs to be considered in conjunction with the size and distribution of sites. Although there are pockets of residential areas with poor access to allotment sites, the possibility of creating new sites using LBH land is challenging, with prohibitive capital and maintenance costs. Improved accessibility to current sites and stronger partnerships with developers is a more realistic strategy in order to improve capacity.

The creation of community gardens managed by the community or third sector might also be one of the options to engage residents in gardening and growing fruit and vegetables.

Focus groups were organised during 2019 to assess latent demand and the assessment discovered that overall there is a demand for allotments in non users and in particular:



Awareness: Most focus group participants knew where their local allotment site was, although not all. Everyone we asked was positively surprised by the number of allotments in Hounslow. Many agreed that allotments advertising could improve.



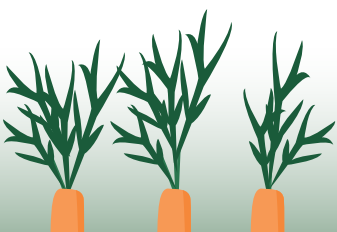
Allotment use: Many spoke about green spaces giving children the chance to be outdoors, but most participants thought allotments were for people of any age. People who recently started gardening can be potentially interested in allotments.



Benefits of allotments: Value was well recognised. The main things that participants spoke of as potential benefits of tending an allotment were growing fresh fruit, vegetables and flowers of your own choice, socialising and being outdoors and wellbeing and exercise.



Barriers with allotments: The main barriers mentioned by participants were time, waiting lists, plot size or lack of confidence. Some other suggestions included the distance from home, allotment rules, weather and cultural barriers.





7. ENGAGEMENT

An extensive engagement process was carried out during 2019 which included the following:

- Online and face-to-face surveys with allotment holders in the borough, to understand more about their needs and priorities.
- A focus group and three 'chat about' with non-users of allotments to understand their perceptions and any potential barriers to use (see section 5.2)
- A seminar with over 100 participants to discuss strengths, weaknesses and opportunities for the allotment service.

The survey with users resulted with **195 respondents** found that:

- **62% were satisfied with the service** and
- **71% were satisfied with their site overall.**

The most important features for the allotment services was considered access, security and water supply.

The main motivations for holders were:

- **to grow their own food (94%),**
- **health and wellbeing (88%),**
- **physical activity (83%)** and
- **sustainability and/or the environment (61%).**

94% of respondents said they **intend to keep renting their plot for the foreseeable future.**

Respondents were most satisfied with:

- **the access to their site (89%)** and
- **the water supply (65%).**

Area for improvements were toilet facilities, waste management and security.

This indicates that although the service is well regarded, there is a need for modernisation, particularly by improving current infrastructure to make allotments safer and more useable.

The seminar explored a number of themes which included management, health and well being and sustainability.

With regards to management, discussions were mainly on how to decrease waiting lists and how to improve infrastructure for better security and toilet provision. This was in line with the findings from the online survey. There was a recognition that staff resource was not sufficient to improve the quality of the service and that an increase of fees and charges could be used to increase staff capacity.

There were numerous suggestions made by residents on how allotments in the borough could be more environmentally friendly. Two of the main discussion points were water use and waste recycling management.

A key area of discussion was about how allotments can benefit other residents and help more widely with health and wellbeing in the borough. Many of the suggestions focussed on using allotments to boost social cohesion and overcoming social isolation by bringing people together. Users suggested partnerships with the NHS and GP surgeries in the borough, encouraging them to promote allotments and prescribe allotments as an alternative to medication for those with physical or mental illnesses.

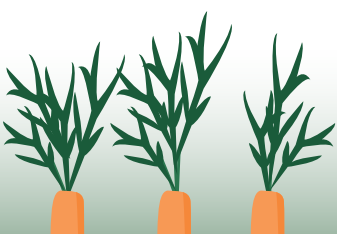
There was also a suggestion to create “gardening champions”, using expertise within allotment users to engage with the wider community and encourage them to participate to cultivate “community plots” that can be created in some allotments or community gardens.

Suggestions for reducing water consumption included the use of water tubs or tanks and improved rainwater catchment. For waste management, there were a number of issues and suggestions raised including stronger regulation.

8. VISION FOR ALLOTMENTS

This vision for the future of Hounslow’s allotments has been developed as a result of the engagement with stakeholders, the public and our partners.

The overall vision for allotments is Hounslow is to “maximise their value for health and wellbeing, stronger communities, biodiversity and sustainable living”





9. ACTION PLAN 2020 – 2025

A set of deliverables stemmed from the engagement with users and the analysis of provision in line with national, regional and local strategies and it is summarised below. Discussions generated commitments from the Council and allotment holders that will help moving forward this strategy.

We will:

- Improve infrastructure to enhance customer experience
- Strengthen partnerships to maximise use and health and well being opportunities
- Improve management practices to increase our service standards
- Identify interventions to improve sustainability

In return we ask you to:

- Keep the sites clean and well looked after
- Participate positively and engage to increase the community value of sites
- Respect the communal nature of allotments
- Help us to introduce sustainable practices to minimise waste and increase biodiversity

The detailed action plan includes actions that will need to be implemented in the short term (S) during 2020-21, medium term (M) during 2020-2023 and long term (L) during 2021-2025 or ongoing.

Theme 1 – Improving Infrastructure provision

Ref	Objectives	Deliverables	Timescales	Owner	Budgets
1A	Prepare an infrastructure development plan	Improvement programme to be phased over three years and reviewed every year	M	LBH/GS360/ Allotment holders	CIL/responsive maintenance/ reserves
1B	Introduce water butts as a mean to store rainwater	Sites identified for the suitable introduction of water butts	S	LBH/GS360	CIL/capital grants
1C	Review of toilet provision with the introduction of composting toilets	Sites identified for the suitable introduction of composting toilets	S	LBH/GS350	CIL/capital grants
1D	Review policy on huts provision and enforcement for non compliance	Safer use of huts and sheds	S	GS360/ enforcement/ allotment holders	Existing revenue budgets and rent fees
1E	Identify access and security issues and implement interventions to improve security	Replacement and or repair of fencing and gates	M	GS360/ allotment holders/ enforcement	CIL/capital
1F	Improve signage	Replacement and introduction of information boards through a 3 year programme	M	LBH/GS360	CIL/capital



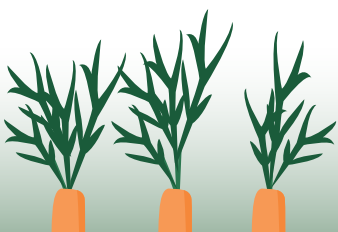


Theme 2 – Strengthen partnerships

Ref	Objectives	Deliverables	Timescales	Owner	Possible funding
2A	Work with community groups, third sectors and developers to increase allotment capacity ideally in area of demand	Establishment of a new community garden and a minimum of 2 additional allotment sites in partnership with developers, particularly in the west of the borough	L	LBH, community groups, third sector, developers	External grants
2B	Establish a referral programme with GPs	GP prescription and activities	M	LBH parks team/Public health	Public health budget
2C	Work with schools to increase participation in children	Prioritise lettings for schools where applicable. Organise a number of events and initiatives with at least 3 schools per year to promote allotments in schools	M	GS360/ education team/events team/schools	School budgets/ grants
2D	Work with third sector charities to develop programme with hard to reach groups	Develop an engagement programme for people with learning disability, dementia or other vulnerable groups	M	LBH Parks team and Public Health. Age UK/Let's go Outside and learn/ Speak out	Thriving community programme/ grants
2E	Work with allotment holders and third sector to create "gardening champions"	Gardening champions in each allotment	S	LBH/ allotment holders/third sector	Existing resources

Theme 3 – Ensuring best management practices

Ref	Objectives	Deliverables	Timescales	Lead Partner	Budgets
3A	Link allotment database with interactive maps	Expand use of existing software Colony to digitise maps and allow online access	M	LBH/GS360	Revenue budgets/ reserves
3B	Introduce site representatives for all sites.	All sites can be represented in discussions and development of the service	S-M	Allotment holders/GS360	Existing resources
3C	Establish an Allotments Forum.	Identify representative and organise forum meetings	S	GS360	Existing resources
3D	Review management of non-cultivation in order to free up new plots	Increase frequency of inspections; Change terms and conditions to strengthen rules for termination.	M	GS360	Existing resources
3E	Review management of waiting lists	Implementation of a number of measures including split plots, introduction of shared plots and a point system that can improve access to people with no access to gardens	M	GS360	Existing resources
3F	Review of fees and charges	Looking at increasing charges to improve allotment management Benchmarking to retain a price structure that can be considered value for money and maintain accessibility.	S	LBH/GS360	Existing resources
3G	Review and update allotment rules	Introduce new rules to address behaviour and waste management.	M	GS360	Existing resources
3H	Encourage self-management across the network	Work with community group to explore devolution for some sites	L	LBH/GS360	Existing resources





Ref	Objectives	Deliverables	Timescales	Lead Partner	Budgets
3I	Enable and support training and cross learning initiatives between sites/users/ community groups	Work with Parks for London, APSE and the National allotment society to seek best practices and disseminate	L	LBH/allotment holders/ community groups/ champions and representatives	Revenue budgets/ grants
3L	Review tree management in key sites to improve access and usage	Improved crown and shrub management to increase capacity where necessary and possibly replacing tree planting elsewhere	M	GS360	Existing resources

Theme 4 – Environmental Sustainability

Ref	Objectives	Deliverables	Timescales	Lead Partner	Budgets
4A	Continue to protect existing allotment supply through effective Planning Policy	Clear planning policy on allotments	L	LBH planning	Existing resources
4B	Review waste/recycling management systems	Regulate waste with specific rules i.e. materials brought onto the site that are not used or waste produced on the site, including green waste, is the plot holder's responsibility to dispose of. Storage of waste should be prohibited.	M	GS36-/LBH recycling	Revenue budgets
4C	Make peat free products compulsory and regulate composting.	Environmentally friendly practices agreed and encouraged amongst users	M	GS360	Existing resources

Ref	Objectives	Deliverables	Timescales	Lead Partner	Budgets
4D	Encourage organic practices	Environmentally friendly practices encouraged amongst users	M	GS360	Existing resources
4E	Identify biodiversity interventions in line with biodiversity action plan	Biodiversity programme as per the Biodiversity action plan including the creation of natural habitats with the aim of preserving and enhance biodiversity	S-M	GS360/ LBH parks team and environmental strategy	CIL/grants
4F	Identify sites for the implementation of cleaner greener campaigns	Identify sites for creation of meadows. Links allotments to food and flower markets.	S-M	LBH cleaner greener/ allotment holders/ community groups	Campaigns budgets/ grants

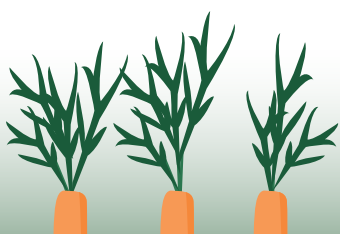
10. PERFORMANCE AND REVIEW

One of the Key actions is to establish an Allotment Forum that together with the Greener community reference group and the Cleaner, Greener Hounslow leadership Board will monitor and evolve the implementation of the vision and objectives of this Allotments Strategy.

Monitoring and evaluation will be an ongoing process with regular reviews and workstreams that will help the strategy implementation.

Hounslow's success in delivering the Strategy Objectives will be measured against local and national standards including:

- Customer satisfaction with the allotment sites and service;
- Occupation levels
- Average waiting time for plots and waiting lists
- Delivery of the workstreams as per timescales.





APPENDIX 1 – LEGISLATION AND POLICY

NATIONAL CONTEXT

The Allotment Acts

The legal framework for Allotments has developed in a piecemeal fashion and is encapsulated within a number of Acts identified below.

Act and Date	Relevance
Small Holdings and Allotments Act 1908	Consolidated all previous legislation and laid down the basis for subsequent Acts.
	Placed a duty on local authorities to provide sufficient allotments according to demand. Makes provision for local authorities to compulsory purchase land to provide allotments.
Allotments Act 1922	Limited the size of an individual allotment to one quarter of an acre and specified that they should mostly be used for growing fruit and vegetables.
Allotments Act 1925	Required local authorities to recognise the need for allotments in any town planning development. Established statutory allotments which a local authority could not sell or convert to other purposes without Ministerial consent.
Allotments Act 1950	Made improved provisions for compensatory and tenants' rights. Confined local authorities' obligation to 'allotment gardens' only.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) states:

“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area”.

(NPPF, Paragraph 73)

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.” (NPPF, Paragraph 74).

Planning Practice Guidance

Planning Practice Guidance (PPG) states:

“Open space should be taken into account in planning for new development and considering proposals that may affect existing open space”. Guidance also states that “it is for local planning authorities to assess the need for open space and opportunities for new provision in their areas”

PPG recognises allotments as “Green Infrastructure”.

Previous Government Guidance

Previous guidance, outlined in PPG17 (2002) identified the role of informal open space, including allotments as performing:

- The strategic function of defining and separating urban areas;
- Contributing towards urban quality and assisting urban regeneration;
- Promoting health and well-being;
- Acting as havens and habitats for flora and fauna;
- Being a community resource for social interaction; and
- A visual function.

PPG17 also identified the issues which Local Planning Authorities should take into account in considering allotment provision and circumstances when disposal may be appropriate. Notably paragraph 13 states:

“Equally, development may provide the opportunity to exchange the use of one site for another to substitute for any loss of open space, or sports or recreational facility. The new land and facility should





be at least as accessible to current and potential new users, and at least equivalent in terms of size, usefulness, attractiveness and quality. Wherever possible, the aim should be to achieve qualitative improvements to open spaces, sports and recreational facilities. Local authorities should use planning obligations or conditions to secure the exchange of land, ensure any necessary works are undertaken and that the new facilities are capable of being maintained adequately through management and maintenance agreements”.

National Allotment Survey (1996)

There is no nationally recognised quantitative standard for allotment provision, however, the National Allotment Survey (1996) identified an average of 15 plots per 1,000 households.

REGIONAL CONTEXT

The London Plan

London Plan Policy 7.18 Protecting Open Space and Addressing Deficiency states:

“A - The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.

B - The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate...

D - Boroughs should undertake audits of all forms of open space and assessments of need. These should be both qualitative and quantitative, and have regard to the cross-borough nature and use of many of these open spaces.” (London Plan MALP, March 2016).

The Mayor seeks to protect open space. The MALP (2016) states that “as part of London’s multifunctional green infrastructure, local open spaces are key to many issues, such as health and biodiversity. Needs assessments can be part of existing borough strategies on issues such as allotments, play, trees and playing pitches and the preparation of a green infrastructure strategy will need to bring together the outputs of these borough strategies” (London Plan MALP, March 2016).

London Plan Policy 7.22 Land for Food states:

“A - The Mayor seeks to encourage and support thriving farming and land-based sectors in London, particularly in the Green Belt.

B - Use of land for growing food will be encouraged nearer to urban communities via such mechanisms as ‘Capital Growth’.

C - Boroughs should protect existing allotments. They should identify other potential spaces that could be used for commercial food production or for community gardening, including for allotments and orchards....” (London Plan MALP, March 2016).

HOUNSLOW CONTEXT

Hounslow Local Plan 2015-2030

Hounslow Local Plan Policy GB8: Allotments, Agriculture and Local Food Growing: outlines that the Council’s current approach to allotments is to encourage their continued use. This is to be achieved by:

Policy GB8 - Allotments, agriculture and local food growing

Our approach:

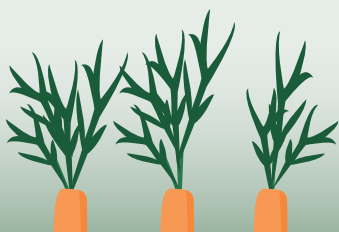
We will encourage the continued use of allotments and agricultural land, and promote new, innovative uses of green space for local food growing, including community farming, gardening and orchards, and commercial food production.

We will achieve this by

- a. Retaining the existing allotments and resisting their loss unless in accordance with the borough’s Allotment Strategy;
- b. Protecting agricultural land;
- c. Working with partners and local communities to identify sites with potential for local food growing and supporting projects that promote community gardening, farming and orchards; and
- d. Supporting initiatives for commercial food production.

We will expect development proposals to:

- e. Be consistent with and positively contribute to the open space and/or nature conservation designation of the land;
- f. Retain allotments and the best and most versatile agricultural land, unless it can be demonstrated that they are no longer required or viable for such purposes. In the event that such land is no longer required, the feasibility of appropriate alternative open space uses which allow the site to maintain its value for growing food such as community gardens or orchards, should be considered first; and
- g. Avoid adverse impacts on adjacent allotments or agricultural land.



Hounslow's
ALLOTMENTS
STRATEGY

2020 – 2025

Appendix 5 Highways officer comments

Victoria Barrett-Mudhoo

From: Edward Nash <Edward.Nash@hounslow.gov.uk>
Sent: 16 March 2021 11:27
To: Victoria Barrett-Mudhoo
Cc: James Fennell
Subject: RE: Syon Park - Park Road application (reference P/2020/4292) [NLP-DMS.FID678265]

CAUTION: This email originated from an external source.

Hi Tor,

Apologies for not sending across earlier. Please see below in italics - any queries, let me know.

The site has a PTAL of 1b/2 and is therefore considered to have poor accessibility to public transport. There are three bus services in the West Middlesex Hospital grounds within 400m of the site, with a further two services on Twickenham Road within 550m of the site. Isleworth's Large Neighbourhood Centre, as defined by the Local Plan, is 550m to the south. The site is not within a CPZ though the Church Street/Mill Plat CPZ does operate on the streets to the south of the site.

Access to the site and the church beyond is currently taken from Park Road. The proposals include relocating the main vehicular access to Snowy Fielder Way, while retaining the existing Park Road access for larger vehicles, such as the council's refuse vehicles, and emergency services. The principle of the vehicular access on Snowy Fielder Way is acceptable, however, I question whether the retained egress onto Park Road is necessary. Consolidating all the vehicle movements to the Snowy Fielder Way access would be preferable in terms of highway safety and pedestrian movement along Park Road so the applicant needs to demonstrate that a refuse vehicle cannot turn using the vehicular access in front of Block E to leave via Snowy Fielder Way. If the Park Road access is ultimately shown to be necessary, it needs to be redesigned so that it is as narrow as possible and promotes pedestrian priority along Park Road – this needs to be shown on revised plans. Also, strict management and monitoring of the access needs to be secured as part of the legal agreement so that it is only used by vehicles that cannot otherwise egress the site and managed accordingly.

The plans indicate there would be primary vehicular and pedestrian access to the allotments directly from Snowy Fielder Way to the south of the residential access, with secondary vehicular access to the east of Block G. This arrangement is acceptable in principle, however the location of the proposed blue badge space adjacent to the main access does raise concerns. A car parked in this location would obstruct visibility for any drivers leaving the allotment access or obstruct visibility for pedestrians seeking to cross the road at that point to continue south. The blue badge space as laid out is not provided with the 1.2m buffer to the rear therefore people using this space would either have to use the carriageway to access their boot, or, if they reversed into the space, would require the vehicle to jut out into the carriageway. As such, the location of the disabled person's parking space needs to be reconsidered.

A footway is proposed to be introduced along the eastern side of Snowy Fielder Way. This needs to link to the existing footway to the north of No 1 Snowy Fielder Way so that people are provided with a safe route between the site and the Isleworth neighbourhood centre that doesn't require them to cross Snowy Fielder Way on a bend. The lack of a continuous footway has also been identified in the Active Travel Zone survey as a problem. The plans therefore need to be revised to rectify this problem by linking the proposed new footway with the existing.

The works to the highway will require a s278 agreement and an obligation included in the s106 that they be completed prior to occupation.

The s106 also needs to include a mechanism so that a public right of way for pedestrians and cyclists is secured through the site between Snowy Fielder Way and Park Road that follows the east-west road.

A condition should be imposed so that satisfactory pedestrian visibility splays (2.4m x2.4m) are provided on either side of the accesses prior to occupation and retained thereafter.

The proposed scheme would provide 48 parking spaces including 4 disabled person's spaces for the 80 flats; 41 of these would be within a basement with the remaining 7 at ground level. This equates to 0.6 spaces per unit and adheres to the Publication London Plan standards which allows for up to 1 space for each dwelling.

20% of the parking spaces would be provided with active EV charging points, with the remaining spaces provided with passive infrastructure so that they can be easily converted to active bays in the future. The means to ensure this will need to be detailed in a Parking Management Plan, which also needs to include details about how all the spaces are to be allocated, how parking outside of marked bays will be prevented, and include measures to ensure that the spaces are used most efficiently. The parking spaces should be leased rather than sold. The Parking Management Plan also needs to include provisions so that an additional four disabled person's parking bays can be provided in the future should demand dictate, as required by the Publication London Plan. A satisfactory Parking Management Plan needs to be secured by condition. Details of the EV charging points may need to be secured as part of the s106 agreement.

Overnight parking surveys were undertaken, which indicated that streets in the vicinity are already heavily parked, particularly Snowy Fielder Way on which no spaces were observed on either night surveyed.

Census data for the Mid-Super Output Area in which the site is located (Hounslow O20) indicates that the average car ownership level for the proposed development is 45.5. Therefore, the provision of 48 parking spaces is considered an appropriate level and would accord with local and regional policies.

Although the proposed on-site parking capacity would cater for the anticipated parking demand from the development, to minimise occurrences of overspill parking, the Transport Assessment proposes that the flats should be made ineligible for parking permits for existing or future CPZs in the area – this will need to form part of the legal agreement. A contribution would also need to be secured to consult existing residents about the possible introduction/extension of a CPZ where none already exists, and about the satisfaction with the hours where one already exists. A further contribution would be required to enact any changes that come out of the consultations.

To estimate the number of trips that would be generated by the proposed development, the Transport Statement used that same TRICS survey results that were used for the previous application. Given that the previous application was submitted 5 years ago and the TRICS results that informed the previous trip rate were from 2014 and 2002, the trip generation exercise should be run again using more recently surveyed comparable sites. If more recent comparable sites are not available then this should be explained rather than relying on data which is nearly 20 years old.

147 long-stay (resident) and 3 short-stay (visitor) cycle spaces are required for the residential element to comply with the London Plan (2021) standards. 97 spaces would be provided in the basement by utilising Sheffield stands and two-tier racks. A further 18 communal spaces are provided within a store in Block G, with each of Block G's 8 ground floor units also having 2 spaces within their private amenity areas. 8 additional spaces are shown between Block A and B and between B and C. This gives an overall provision of 147 long-stay spaces thereby complying policy in terms of numbers. However, it is not clear if any of these various provisions would be fully enclosed or if the areas where they are located would be afforded sufficient security. Many of the provisions appear to be accessible to anyone within the communal areas, including visitors to the development, and this would discourage residents from using the spaces to store cycles. Even if the frame of a bike is securely locked to a stand, the bikes would still be vulnerable to vandalism and the components vulnerable to theft. The lack of secure enclosures would also discourage people from leaving lights, panniers, child seats, etc attached to their cycles thereby reducing the convenience of cycling over private car use. Therefore, the security of the long-stay cycle spaces needs to be reconsidered and as this

may entail additional structures being constructed within the site, the revised provisions should be sought prior to determination.

The proposed provisions for Block G's ground floor units would require residents to wheel their cycles through their flats to access the store which is neither appropriate nor conducive to convenience – this needs to be reconsidered.

6 short-stay cycle spaces formed using Sheffield stands would be provided adjacent to the concierge which is acceptable. A further 2 Sheffield stands providing 4 spaces are shown inside the entrance to the allotments which is also acceptable.

A loading bay would be provided on-site adjacent to the concierge's office. The concierge would be able to receive some parcels and other deliveries on behalf of residents which would reduce dwell times for delivery vehicles and reduce the need for repeat trips if a resident was not at home. The swept paths in the Transport Statement's appendices demonstrates that smaller delivery vehicles (<=3.5T panel van) would be able to turn on-site to leave via Snowy Fielder Way, while larger vehicles would need to leave via Park Road through the retractable bollards. More detail needs to be included in the Delivery and Servicing Plan (DSP) to explain how the retractable bollard would be controlled and maintained to prevent misuse and failings. A revised DSP that incorporates this detail should be secured by condition.

Please consult the council's Waste and Recycling team about the proposed waste management strategy and swept paths that are outlined in the DSP.

An outline Construction Method Statement (CMS) has been produced by Bluesky Building, which would need to be updated with more detail when the construction programme get firmed up and when the main contractor has been appointed. The outline CMS, the Transport Statement, and the submitted Cover Letter all refer to a separate outline Construction Logistics Plan that has been produced by Caneparo Associates but the file cannot be located. Regardless, a detailed Construction Logistics Plan and a separate Construction Environmental Management Plan would need to be secured by way of a standard pre-commencement condition. The Construction Logistics Plan should look to take construction vehicles directly off Park Road to minimise disturbance to residents of Snowy Fielder Way, needs to avoid deliveries during school drop-off and pick-up times, use operators that are FORS Silver accredited or better, along with satisfying the rest of the criteria that is listed in the condition.

A Residential Travel Plan to encourage more active and sustainable modes of travel has been submitted. This would need to be updated to include details of the Travel Plan Co-ordinator (even if it's only an interim appointment) and the remedial measures need to include an extension of the travel plan monitoring if the targets are not met after the initial five year period. A revised Travel Plan can be secured by way of the s106 agreement which also needs to secure the Travel Planning monitoring fee.

Kind regards,

**Edward Nash | Senior Strategic Planner
Strategic Development and Delivery
Housing, Planning and Communities**

Direct number: 020 8583 2994

My pronouns are: He/His

London Borough of Hounslow
Hounslow House, 7 Bath Road, Hounslow, Middlesex TW3 3EB

Any views or opinions expressed in this e-mail are those of the sender and, while given in good faith, do not necessarily represent a formal decision of the Local Planning Authority unless a statutory application is or has been made and determined in accordance with requisite procedures, planning policies and having had regard to material considerations

Appendix 6 Hounslow Open Space Background Paper, 2020

London Borough of Hounslow Local Plan Reviews:
Open Spaces Background Paper

September 2020

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EXECUTIVE SUMMARY

This paper outlines the open space strategy for Hounslow borough, as set out in the Great West Corridor and West of Borough local plan reviews. The paper explains the methodology and justification for the policy position on open space.

Evidence base on open spaces and open space deficiency

The Hounslow Local Plan 2015, and evidence supporting this document, has already identified that, whilst there is a good overall level of open space in the borough, the quantity, quality and accessibility of open spaces varies substantially across Hounslow. Areas of open space deficiency have been identified in various areas across different typologies, which are set out in this paper.

These findings are corroborated by more recent research indicating that, whilst there is generally a good quantity of open space provision in the borough, there is a general deficiency in the quality of many open spaces as well as quantitative and accessibility deficiencies for certain typologies in locations across the borough.

The local plan review strategies

The current local plan reviews focus on delivering sites to support growth in the Great West Corridor (GWC) and the West of the Borough (WoB) areas. Therefore, some of the areas of deficiency are outside these plan areas, but some fall into them and will therefore form a focus for these documents.

These are:

- North Central area, including Cranford & Heston – WoB Plan
- Isleworth & Brentford – GWC Plan
- West area, including Feltham & Bedfont – WoB Plan

Both local plan reviews have the objective of achieving significant growth. Therefore, both will have a role in delivering new and enhanced open spaces to support this growth, as well as to help alleviate these existing deficiencies.

In the WoB, the strategy is to support growth and alleviate deficiency partly through the provision of new parks, such as at Heathrow Gateway and Rectory Farm. It is acknowledged, however, that these sites are expected to be delivered at the end of the plan period, or beyond the plan period. Therefore, the Council proposes to provide enhanced access and connections to the Bedfont Lakes Country Park, as well as closer integration between new and existing communities in this part of the borough, to high-quality open spaces.

There are a number of Green Belt releases proposed in the plan area which are being proposed to help the borough meet its development requirements. At these sites, the council will (a) seek to deliver high-quality open space on-site and enhanced connections with adjacent open spaces and green corridors, and (b) seek contributions from development on these sites for compensatory improvements to land remaining in the Green Belt or Metropolitan Open Land (MOL).

The Council will also support initiatives to enhance land being designated as MOL. Many of these projects will be those encapsulated in the Colne and Crane Valley Green Infrastructure Strategy. In particular, this strategy identifies a number of practical measures to enhance the quality of open spaces in the area, such as in the Crane Corridor, Hounslow Heath, Feltham Marshalling Yards, Hanworth House and Park, East Bedfont Lake and Bedfont Lakes Country Park. The MOL assessment carried out by Arup as part of the Council's Green Belt Assessment has also identified opportunities for conserving, enhancing or restoring parcels and elements within parcels which they had recommended for redesignation as MOL.

In the Great West Corridor, the fine-grained urban context means there is limited opportunity for the delivery of new open space in this plan area. Instead, therefore, the strategy focuses on delivering new public squares which will provide an open space function within the new developments it is proposing. A series of key locations are identified which can achieve this aim, at the Tesco Osterley site, the Gillette Building, West Cross Campus, the River Brent Quarter and the Brentford Stadium Quarter.

In addition, the Council proposes to enhance key existing open spaces, including Boston Manor Park, Carville Hall Parks and Gunnersbury Park. The plan also seeks to improve waterfront accessibility to the River Brent/Grand Union Canal and the River Thames, through towpath improvements and proposals to integrate the area's existing green and blue infrastructure.

Site allocations

The site allocations supporting the plan reviews include proposals to release four designated local open spaces for development. These are:

- two former allotment sites – these are being allocated for development on the grounds that they have not been open for public access for a substantial period of time and therefore can be classed as surplus to requirements, in line with the requirement for such policies in the local plan policy.
- one area of wasteland – this is being allocated for development on the grounds that it is not accessible to the public, and can therefore be classed as surplus to requirements, in line with local plan policy;
- one site containing disused tennis courts – this is being allocated for development on the grounds that the tennis courts have been closed for many years, and the council's Playing Pitch Strategy has found that there is no needs case for reinstating former tennis courts.

Next steps

The next Local Plan Review will be a borough-wide document, and will therefore be informed by a comprehensive open spaces assessment.

1. Introduction

The role of open space in new development

- 1.1 Hounslow Borough is blessed with an abundance of open space, with historic parks such as Osterley Park, Syon Park and Gunnersbury Park providing a wealth of green space in addition to natural spaces such as Hounslow Heath and Bedfont Lakes, and many smaller amenity and play spaces also playing a vital role in the borough's open space provision.
- 1.2 Many of these spaces lie in the two plan review areas of the West of the Borough (WoB) and Great West Corridor (GWC). However, the provision of open space and its effectiveness also has challenges both borough-wide in the plan review areas. Research has found areas of deficiency across the borough, including in the WoB and the GWC, whilst the growth envisaged in the plan reviews will add to pressures on existing provision as well as set challenges for how open spaces is provided effectively for existing and new residents.
- 1.3 National policy emphasises the vital role which access to a network of high-quality open space and opportunities for sport and physical activity plays in ensuring the health and well-being of communities. Furthermore, the experience of the Covid-19 outbreak in 2020 has only served to stress the importance of a good supply of parks and open spaces. The pandemic and lockdown have emphasised how crucial good access to high-quality open space is for physical and mental health, particularly for those without access to a garden.
- 1.4 Hounslow Council seeks to protect and enhance its supply of open space, and has formulated a strategy within the plan reviews which aims to implement this objective. This seeks to achieve improvements to existing open spaces as well as to deliver new key open spaces in strategic new developments. This paper outlines this approach, and explains how it has been guided by the evidence base, particularly on open space needs and areas of deficiency, and how the strategy has been conceived from masterplan-led approaches for designing new open spaces into growth areas.
- 1.5 The paper also sets out how the process has been underpinned by a sustainability appraisal.

2. National policy and guidance

National Planning Policy Framework (NPPF) (2019)

- 2.1 Paragraph 20 of the NPPF states that local planning authorities should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for green infrastructure. Green infrastructure is defined in the glossary of the document as a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
- 2.2 Paragraph 96 of the NPPF states that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
- 2.3 Open space is defined in the glossary of the document as all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Planning practice guidance (Open space, sports and recreation facilities, public rights of way and local green space)

- 2.4 Planning practice guidance (PPG) states that open space should be taken into account in planning for new development and considering proposals that may affect existing open space. Open space, which includes all open space of public value, can take many forms, it says, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built environment, and an important component in the achievement of sustainable development.
- 2.5 The guidance states that it is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. In carrying out this work, they should have regard to the duty to co-operate where open space serves a wider area, it says. It states that authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities.

3. Strategic policy

Existing London Plan policy

- 3.1 Policy 7.18 of the London Plan (March 2016) states that the mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency. It says the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up-to-date needs assessment shows that this would be appropriate, it says.
- 3.2 The policy states that when assessing local open space needs, local development frameworks should:
- Include appropriate designations and policies for the protection of open space to address deficiencies;
 - Identify areas of open space deficiency (using a given categorisation as a benchmark for all the different types of open space identified therein)
 - Ensure that future publicly accessible open space needs are planned for in areas with the potential for substantial change such as opportunity areas, regeneration areas, intensification areas and other local areas;
 - Ensure that open space needs are planned in accordance with green infrastructure strategies to deliver multiple benefits.
- 3.3 The policy also states that boroughs should undertake audits of all forms of open space and assessments of needs. These should be both qualitative and quantitative, and have regard to the cross-borough nature and use of many of these open spaces.

New London Plan policy

- 3.4 Policy G1 (Green Infrastructure) states that London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits, it says.
- 3.5 The policy states that boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network.
- 3.6 Development plans and area-based strategies should use evidence, including green infrastructure strategies, to:
- Identify key green infrastructure areas, their function and their potential function;
 - Identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
- 3.7 The All London Green Grid (ALGG) is the policy framework to promote the design and delivery of green infrastructure across London, and includes supplementary planning guidance adopted in 2012. An area framework for

the River Colne and Crane area – the part of the ALGG which covers parts of Hounslow borough - was published in 2011.

3.8 Policy G4 (Open Space) of the Intend to Publish New London Plan states that development plans should:

- Undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency (using the given categorisation of different typologies of open space), taking into account the quality, quantity and accessibility of open space;
- Include appropriate designations and policies for the protection of open space to meet needs and address deficiencies;
- Promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change;
- Ensure that open space, particularly green space, included as part of development remains publicly accessible.

3.9 The policy states that development proposals should:

- Not result in the loss of protected open space
- Where possible create areas of publicly accessible open space, particularly in areas of deficiency.

3.10 The categorisation for public open space outlined in the plan is as follows:

- Regional Parks (400ha)
- Metropolitan Parks (60ha)
- District Parks (20ha)
- Local Parks and Open Spaces (2ha)
- Small Open Spaces (under 2ha)
- Pocket Parks (under 0.4ha)
- Linear Open Spaces

3.11 The plan says these represent examples of typical open space typologies in London, but that other open space types may be included to reflect local circumstances.

3.12 The supporting text to the policy states that boroughs should undertake an open space assessment, which should be in line with objectives in green infrastructure strategies (drawing from existing strategies such as play, trees and playing pitches). These strategies and assessments should inform each other to deliver multiple benefits in recognition of the cross-borough function and benefits of some forms of green infrastructure. Paragraph 8.4.3 of the plan says new provision or improved public access should be particularly encouraged in areas of deficiency in access to public open space.

3.13 Policy G5 introduces the concept of Urban Greening. This covers a wide range of options including, but not limited to, street trees, green roofs, green walls and rain gardens. It can help provide a range of benefits including amenity space, enhanced biodiversity and addressing the urban heat island effect. Amenity benefits are especially important in the most densely developed areas where traditional green space is limited, the plan says.

- 3.14 The policy requires major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees, green roofs, green walls and nature-based sustainable drainage).
- 3.15 The policy requires boroughs to develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The interim targets are 0.4 for predominantly residential developments and 0.3 for predominantly commercial developments. These exclude B2 and B8 uses, but these uses will still be expected to set out what measures they have taken to achieve urban greening on-site and quantify what their UGF score is.
- 3.16 Policy G8 (Food Growing) says boroughs should protect existing allotments and encourage provision of space for urban agriculture, including community gardening and food growing within new developments and as a meanwhile use on vacant or und-utilised sites. They should also identify potential sites that could be used for food production.
- 3.17 It should be noted that none of these policies have been subject to revision by the panel report or subject to directed modifications from the Secretary of State, so they should be afforded substantial weight.

4. Local policy

Hounslow Local Plan (2015)

4.1 Policy GB2 (Open Space) of the adopted local plan states that the Council will protect and enhance local open space. It says this will be achieved by:

- Designating and protecting local plan spaces as shown on the policies map, in line with the NPPF and the London Plan;
- Protecting and enhancing local open space, addressing deficiencies in quality, quantity and access;
- Maintaining the supply of local open space to meet the needs of the borough's growing population by expecting on-site provision of publicly accessible open space, particularly in major new developments in areas of deficiency;
- Encouraging the provision of an appropriate balance and mix of open space types specific to meet needs in different parts of the borough, with specific reference to increasing the provision of parks and gardens;
- Protecting quiet and tranquil areas of local open space that are relatively undisturbed by noise and are valued for their recreation amenity attributes; and
- Working with partners, friends groups, other stakeholders and the general public to improve and enhance the quality of and access to local open space.

4.2 The policy states that the council will expect development proposals to:

- Protect existing local open space from development, especially where it would lead to a deficiency in publicly accessible open space, unless it satisfies the criteria for such development in the NPPF in that: it has been assessed as clearly surplus to requirements; or it would be replaced by equivalent or better provision in a suitable location; or the development is for alternative sports and recreational provision, the need for which clearly outweighs the loss;
- Avoid the loss of or encroachment upon local open space, or intrusion into an open aspect. Development ancillary to the open space use must preserve its predominantly open character and
- Enhance the provision of publicly accessible local open space in the borough, especially in areas of open space deficiency as identified on an annual basis through Annual Monitoring Reports. Major developments should achieve this through onsite provision wherever possible, particularly in areas of substantial change and intensification.

4.3 The 2015 local plan, supported by a PPG17 Study (2011) and Open Spaces Background Paper (2013, updated in 2014), found the following areas of deficiency in open space provision:

- Quantity: Chiswick, Central Hounslow and Cranford and Heston – these areas have less open space in relation to their population than the rest of the borough. This means that open spaces in these areas are already

intensively used, and this will be exacerbated by new development. It is therefore important that development proposals in these areas seek to provide open space on-site to ensure quantity deficiencies are addressed and not worsened.

- Access: The most significant deficiency areas identified in the evidence were Brentford, Isleworth, Central Hounslow and Cranford and Heston. Development should therefore seek to address existing deficiencies in access to open space, and not result in a loss of open space leading to increased deficiency.
- Quality: The west of the borough contains the greatest number of low-quality open spaces, followed by Cranford & Heston and Chiswick. This highlights current management issues, both where there are extensive areas of land to maintain in the west area, and also where high intensity of use may already be leading to poorer quality environments. Investment and improvements should be focused to address issues of low quality.

4.4 The standards advised in the evidence were 0.6ha per 1,000 population for new developments. Hounslow Council has an adopted Community Infrastructure Levy, which came into force in 2015. This collects funding from new developments for open space and sporting and recreational facilities, amongst other things. Money can also be collected for open space through section 106 contributions, for example to address site-specific issues.

4.5 Policy GB8 (Allotments, Agriculture and Local Food Growing) says the council will retain the existing allotments and resisting their loss unless in accordance with the borough's allotment strategy. Development proposals are expected to retain allotments unless it can be demonstrated that they are no longer required or viable for such purposes. In the event that such land is no longer required, the feasibility of appropriate alternative open space uses which allow the site to maintain its value for growing food such as community gardens or orchards, should be considered first.

4.6 Policy GB9 (Play Space, Outdoor Sports Facilities and Burial Space) says the council will resist the loss of play areas or outdoor sports facilities, including playing fields. It will promote the provision of high-quality play spaces that cater for a range of age groups and help meet the needs other boroughs' growing child population, and support high quality sports facilities to meet demands for a range of sports and active pursuits across the borough, and promote the multifunctional use of existing open space for play and sports, including school sports facility and playing fields.

5. The Evidence Base

Open Space Evidence from 2015 Local Plan

- 5.1 The Council carried out a series of studies in support of the 2015 Local Plan. A PPG17 Study was carried out in order to assess the borough's open space, sports and recreational facilities, whilst the Open Space Background Paper assessed local open space needs and identified areas of deficiency.
- 5.2 Overall, the Open Spaces Background Paper found that the total quantity of public open space in the borough is 1365ha, which equates to 5.3ha per 1,000 population and which exceeds the average level of provision for similar and neighbouring boroughs (whose provision stands at 3.6ha per 1,000 population).
- 5.3 However, the study also found that the provision of public open space varies widely between different parts of the borough, with the highest level in Isleworth and the lowest in Chiswick, closely followed by Central Hounslow and Heston & Cranford. It found that in Chiswick, Central Hounslow and Heston & Cranford, provision falls well below the average and that these areas are considered to have a quantitative deficiency in public open space. These quantitative deficiencies link to intensive use of public open spaces in these parts of the borough, identified through surveys, it added.
- 5.4 The study recommended that this issue should be addressed through the dual approach to implementing standards which would ensure borough-owned public open space is maintained to a high standard and that new development provides onsite public open space.
- 5.5 The paper noted that, even where new open space is provided on-site new residents will also use existing open spaces. To accommodate for the rise in population, it said, it will be necessary to invest in maintaining and improving the quality and facilities of existing public open space, and a CIL contribution will be used to achieve this.
- 5.6 The paper also noted that, in order to help mitigate the impact of increasing population on the use of existing open space, and to contribute to maintaining the current wealth of open space, new developments will be required to create publicly accessible open space on-site where possible. It said this will assist in meeting the local open space needs of residents of new development and the local population, as well as creating sustainable neighbourhoods, networks of green infrastructure and adding to local character, as required by the London Plan.
- 5.7 The paper also looked at access to public open space. It found that areas of public open space deficiency can be seen in fairly small pockets across the borough, with the most significant areas in Isleworth, Central Hounslow, and Heston & Cranford. The area of deficiency in the West of the borough consists of utilities (gas works), industrial and farmland and therefore does not affect a residential population. Public open space deficiency largely occurs due to a lack of public open space in specific areas, it found, but in Heston & Cranford it is also due to severance by major transport arteries.

- 5.8 The paper found that public open space deficiency can be addressed by:
- Protecting all public open space, and maintaining and enhancing the open space the Council owns and manages, and by
 - Requiring new development to provide on-site public open space to help mitigate the impact of an increasing population on the use of existing areas of open space.
- 5.9 The paper noted that on-site public open space may be delivered through the creation of new open space, or by opening up public access to existing open space that is not currently accessible. Major new developments should make on-site provision of public open space, it said, to cater for the open space needs of residents of the development (the new population) which may also help to tackle existing access or quantitative deficiencies in an area. Any new open space should account for typology-level deficiency across different areas of the borough, and this will help towards maintain the relatively high overall level of public open space in the borough. It will also help achieve the objective of high-quality design within new development, and help create networks of green infrastructure and sustainable neighbourhoods.
- 5.10 The PPG17 Study also undertook a quality and value assessment of council-owned and managed open spaces. The study found that West Area contains the greatest number of low-quality open spaces, followed by Heston & Cranford and Chiswick. This is particularly an issue, it said, in Heston & Cranford and Chiswick, where the low quantitative provision of public open space means there is likely to be a higher intensity of use by local residents. Intensive use may itself be a reason for low quality environments which is exacerbated by growing local population, and this should be a priority for spending and investments, and help direct spending of financial contributions.

Open Spaces Study 2018

- 5.11 A further Open Spaces Study was carried out in 2018, to provide an updated snapshot of the provision of open space across the borough.
- 5.12 This research covered the typologies of open space listed below:
- Parks and gardens
 - Natural and semi-natural greenspace
 - Amenity greenspace
 - Provision for children and young people
 - Allotments
 - Cemeteries/churchyards
 - Green corridors
- 5.13 The research assessed the provision of each typology based on the following factors:
- Measuring the quantity of provision (i.e. how many sites of each typology);
 - Measuring the quality and value of open spaces (measured on site visits against set thresholds, and based on a list of criteria to recognise the different roles played by quality and value considerations);
 - Identifying local need through an online community survey and a survey for children;

- Assessment of accessibility catchments and identification of potential gaps in provision.

5.14 The research looked at the latest figures relating to open space deficiency, and found that **qualitative** deficiencies exist throughout the borough for certain typologies. This is illustrated by the fact that there are a range of sites, spanning various typologies and in all areas, which are scored as low quality. These are summarised as follows:

Table 1: Summary of qualitative deficiencies in open space

Analysis area	Number of low quality sites	Split of typologies of low-quality sites
<i>Chiswick</i>	3	1 Allotment 1 Amenity Greenspace 1 Parks and Gardens
<i>Isleworth and Brentford</i>	9	3 Parks and Gardens 3 Play Provision 2 Amenity Greenspace 1 SNG
<i>North Central</i>	18	8 Amenity Greenspace 7 Play Provision 2 SNG 1 Green Corridor
<i>South Central</i>	8	5 Amenity Greenspaces 2 Play Provision 1 Allotment
<i>West Area</i>	33	12 Amenity Greenspaces 11 Play Provision 3 SNG 3 Cemeteries 3 Green Corridors 1 Parks and Gardens

Source: Open Spaces Study

5.15 The audit found a **quantitative** deficiency of open space identified in certain typologies, in the following areas:

- Chiswick - parks and gardens; natural and semi-natural greenspace; amenity greenspace;
- Isleworth & Brentford - allotments;
- North Central (including Cranford & Heston) - parks and gardens; natural and semi-natural greenspace; allotments; and
- South Central (including Central Hounslow) - parks and gardens; amenity greenspace; allotments.

5.16 Areas of deficiency by **accessibility** were found in the following areas:

- Chiswick (allotments, parks and gardens, and play provision for older age ranges),
- Isleworth & Brentford (amenity greenspace),
- North Central Area (Parks and gardens),

- South Central Area (play provision for older age ranges) and
- West area (allotments and parks and gardens).

5.17 So overall, it can be seen that there are areas of open space deficiency which are relevant to parts of both the plan review areas:

- North Central area, including Cranford & Heston – WoB Plan
- Isleworth & Brentford – GWC Plan
- West area, including Feltham & Bedfont – WoB Plan

5.18 Therefore, the Council considers that a key part of the strategy for both plans should be to protect and enhance existing open space provision, including improving linkages between areas of open space and between existing and new residential areas and open space, and to secure new high-quality open space provision from new development where opportunities arise.

6. The vision and strategy - Great West Corridor

The GWC Masterplan

- 6.1 The GWC Masterplan, commissioned to provide a framework for the growth of this Opportunity Area, says there are three areas of open space deficiency identified within the study area. The largest of these areas is located between Boston Manor and Carville Hall Parks. These are illustrated in Figure 2.26 of the GWC Masterplan.
- 6.2 In order to alleviate these deficiencies and to help support the growth of the area, the masterplan, proposes a series of new open spaces as part of the development of the area. It says public spaces are best located at pivotal points in the pedestrian network, where they are easy to access and benefit from natural footfall through the area. The study proposes these new spaces central to the proposed new quarters, in locations where they are protected from noise and impacts of the strategic road network. These open spaces serve a number of purposes, it says.
- 6.3 They form part of the essential green infrastructure in the GWC and integrate with the wider strategic green infrastructure network. They should provide a range of outdoor amenities and offer flexibility of use for local events. Their future maintenance needs to be considered from the outset – suitable and sustainable maintenance arrangements need to be put in place that ensure a quality upkeep of new and existing open spaces in perpetuity.
- 6.4 These new public open spaces are proposed at:
- Tesco Site – central neighbourhood green
 - Gillette – a series of pocket courtyards
 - West Cross Campus – central green space and arrival piazza outside Golden Mile Station
 - River Brent Quarter – enhanced open space along the River Brent and integration of existing open space to the south of the railway (to the back of Robin Grove);
 - Brentford Stadium Quarter – new station plaza outside proposed Lionel Road station, new space on Capital Interchange Way and central space within the B&Q site development.

Resulting Strategy and Policies

- 6.5 In the Great West Corridor, there are two parks – Carville Hall Park and Boston Manor Park. However, access to these spaces is restricted due to the M4/A4 corridor which limits movement in a north-south direction. The wider area surrounding the GWC is unique in its number of historic parks and gardens which include Gunnersbury Park, Syon Park, Osterley Park and the Royal Botanic Gardens at Kew. These protected sites are planned landscapes which have historic significance.
- 6.6 One of the key themes of the GWC is to overcome the severance of the road corridor by improving existing and establishing new crossing facilities to

improve permeability between different areas of the corridor, and to improve the accessibility and the quality of existing open spaces, as well as to deliver new public spaces as part of development. Figure 6.1 shows how this includes improving connections between key parts of the GWC and existing parks and open spaces such as Gunnersbury Park, Boston Manor Park, Carville Hall Park and also areas outside the study area such as Syon Park and Key Gardens.

The resulting policy approach: The GWC Plan

- 6.7 In the Great West Corridor, there is limited opportunity for the delivery of new open space in this plan area, so the strategy focuses on delivering new public squares which will provide an open space function within the new developments it is proposing. A series of key locations are identified which can achieve this aim, at the Tesco Osterley site, the Gillette Building, West Cross Campus, the River Brent Quarter and the Brentford Stadium Quarter.
- 6.8 In addition, the Council proposes to enhance key existing open spaces, including Boston Manor Park, Carville Hall Parks and Gunnersbury Park, in order to improve their usage, including through improving connections to and between these open spaces. The plan also seeks to improve waterfront accessibility to the River Brent/Grand Union Canal and the River Thames, through towpath improvements and proposals to integrate the area's existing green and blue infrastructure.
- 6.9 The strategic open space objectives for the plan are:
- **Strategic Objective 9: To protect and enhance the quality, accessibility and function of green infrastructure and open spaces, whilst improving the ecology of the area and ensuring an overall net gain in biodiversity;**
 - **Strategic Objective 10: To establish a well-connected and continuous green corridor that strategically links green infrastructure and open spaces with neighbourhoods and workplaces.**
- 6.10 **Policy GWC4 (Open Space and Green Infrastructure)** is the strategic open space policy in the GWC Plan. The overall approach of the policy is that the council will protect and enhance existing open space and establish a well-connected and continuous green and blue network that strategically links green open spaces, public squares and rivers with neighbourhoods and workplaces to enhance opportunities for relaxation, recreation and a healthy lifestyle.
- 6.11 Key objectives for the council under this policy will be to improve access and links to and through open spaces, protecting and improving the quality, function, activities and offer of open spaces in and around the area and ensuring that these spaces are not compromised when additional facilities are proposed. And it also seeks to improve the facilities and range of offer including leisure, recreation, play, sports, arts, cultural and entertainment facilities at Boston Manor Park, Carville Hall Park and Gunnersbury Park.

- 6.12 The plan acknowledges that providing high-quality new green infrastructure and accessible open space can be challenging in a high-density environment, where particular consideration will need to be given to providing adequate sunlight and daylight into new open space, ensuring that they are of a high quality that will provide residents with meaningful open space.
- 6.13 To address this, applicants will be expected to consider green infrastructure and open space provision identified in the GWC Masterplan early in the design process, in terms of its spatial layout, functionality, quality of design and microclimate and long-term management arrangements. The policy sets an urban greening factor score of 0.2 for predominantly industrial development, 0.3 for mixed employment and commercial development and 0.4 for predominantly residential development, reflecting latest mayoral guidance.
- 6.14 Specifically, the plan strategy is to:
- Improve the facilities and range of offer including leisure, recreation, play, sports, arts, cultural and entertainment facilities at Boston Manor Park, Carville Hall Parks and Gunnersbury Park.
 - Improve waterfront accessibility through towpath improvements and proposals that will successfully integrate the areas' existing green and blue infrastructure with the wider networks, including the River Brent/Grand Union Canal and the River Thames.
 - Require development proposals to contribute towards the quality, function and offer of existing open spaces and the delivery of new high-quality publicly accessible squares and open spaces at:
 - Tesco site – green public open space and water garden;
 - Gillette – green public open space
 - West Cross Campus quarter – green public open space and public plaza outside Golden Mile Station
 - River Brent Quarter – enhanced open space along the Brent River and integration of existing open space to the south of the railway (to the back of Robin Grove); and
 - Brentford Stadium Quarter – new station plaza outside proposed Lionel Road station and green public open space at Capital Interchange Way and B&Q site.
- 6.15 These requirements are illustrated in Figure 4.7 of the plan, and are outlined in the place policies in the plan. Site allocation policies for the key sites also require the on-site open space improvements identified where appropriate.

7. The vision and strategy – the West of Borough (WoB)

The West of Borough Opportunity and Capacity Study

7.1 The West of Borough OCS sets out the possible vision for the West of Borough, and presents initial concept and capacity studies for key strategic sites. As part of this, it assesses the scope for new and enhanced public open spaces at these strategic sites.

Heathrow Gateway

7.2 The study highlights the opportunity for a new park at Heathrow Gateway to serve both possible future development here and the wider East Bedfont area. Mayfield Park, it says would be a new district park and could make reference to and provide information on the Neolithic causewayed enclosure it is situated above (the Scheduled Ancient Monument). A Central Plaza with hard and soft spaces as well as water basins would be a unique identify for the office quarter and would be part of a linear corridor that connects a new sports and leisure area to the north (SAM) with Bedfont Lakes Country Park to the south.

Bedfont Lakes Neighbourhoods

7.3 The study highlights the opportunity for a new network of pedestrian and cycling connections to be established with the Country Park to ensure it is well integrated and serves the communities along its edges. The development of the Bedfont Lakes Neighbourhoods can contribute to the enhancement of the country park, it says, by providing a bridge link across the railway to connect the currently separated parts of the park with one another, and could further include extension the park into the recently-landfilled are to the south. The expansion could serve as a replacement habitat and help mitigate the impact of proposed development on current nature conservation areas. The study proposes that each of the new neighbourhoods would benefit from local green spaces central to the development.

Airport Business Park

7.4 Green corridors could be established within Airport Business Park, the study says, with quality walking and cycling routes along the main access streets. New routes would link into the existing network of walking and cycling routes in the area and establish missing strategic links between Hatton Cross underground station, the Crane River Corridor, the Duke of Northumberland's River, and associated open spaces and East Bedfont via the bridge at Richmond Avenue. The site would also open up access with the Hounslow Urban Farm, Hatton Cemetery, Bedfont Recreation Ground, Bedfont Football and Social Clubs, Bedfont Primary School and the allotments. The southern

part of the Hatton Meadows SINC would be retained, under the study's concept.

Cranford & Heston

7.5 The OCS also looks at the potential for future change in the Cranford & Heston area. In terms of open spaces, the study highlights the River Crane area as being of particular importance. It says the river banks are lined with an almost continual corridor of natural and semi-natural open spaces, including Cranford and Avenue Parks. This, it says, is a considerable resource for the area and presents significant opportunity for leisure, recreation and active travel. Much of the corridor falls within the Metropolitan Green belt and is part of London's 'Blue Ribbon Network' it says. Much of it is also designated as a site of importance for nature conservation (SINC) and, west of Cranford village, parts of the corridor are also designated as a local nature reeve. The study says the potential to improve access to the river corridor, whilst safeguarding designated wildlife sites, should be fully investigated along with the potential to connect to other green spaces, such as Airlinks Golf Course and Osterley Park.

Feltham Masterplan

7.6 The Feltham Masterplan, commissioned by the Council to help inform the planning framework for the area, highlights the various characteristics and challenges of the key green space in and around the town. These are

Feltham Parks

7.7 This is a group of large open spaces near to Feltham town centre, with a collection of adjoining but separate green spaces - Feltham Arena, Blenheim Park, Glebelands Playing Field, Poor's Piece and Feltham Park, jointly forming a large green space to the west of Feltham station. But the Feltham Masterplan says connections between the spaces is poor and that the area feels fragmented and lacks a quality landscape treatment, adequate facilities and that it can feel unsafe and intimidating.

7.8 Separately, the Feltham Parks Masterplan, commissioned by the council in 2016, reviews the landscape design and usage of Feltham Park and surrounding parks with a view to combining the area into a contiguous green space. The main objectives of this master plan are:

- To develop the Feltham Parks as a sports and physical activity hub;
- To identify effective enhancements/improvement responding to community need for short and long-term investment
- To maximise the usage of the parks, including Feltham Green as green infrastructure for Feltham town centre and the housing zone; and
- To identify income generation opportunities that can sustain the management of the parks and increase usage.

Other green spaces in Feltham

7.9 Other key open spaces in the town are:

- Hanworth Air Park, which is used mainly as playing fields and whose open grass land is bleak and lacks interest
- Natural areas along the Crane River and on Feltham Marshalling Yards, the open grassland of the De Brome Playing Fields, and Hounslow Heath to the east of the centre. All of these lack good public accessibility, it says.
- Feltham Green – an important meeting point and civic space in the town centre but would benefit from greater animation and adjacent activity.

Resulting vision

7.10 The Feltham masterplan draws on its analysis to set out a key spatial concept and vision for the town, including the objective to enhance and better connect its key green spaces. It proposes the following objectives for each key area of open space:

- It proposes to join together the existing open spaces around Feltham Arena into the **Feltham Parklands**, a new urban park that is well designed and well maintained. This would offer a range of recreation and sports facilities for the community, and also includes an events space for open air concerts, cinema and other events.
- **Hanworth Air Park** would be enhanced with a more diverse landscape experience and differentiating sub-areas from each other. The Longford River should be deculverted to create an attractive focal point in the park, it says, with a new wetland area and habitat, with new bridge connections to retain connectivity in the park.
- **Upper Crane Park:** there is an opportunity here to join together parts of the River Crane landscape, the De Brome playing fields and the Feltham Marshalling Yards into a new public green space. This would create the Upper Crane Park, a contiguous high-quality open space and well-managed nature reserve with better connections including new paths and connections across the river.

7.11 The masterplan proposes the following enhanced or new public spaces:

- High Street Plaza
- Feltham Green
- Bridge House Pond
- Station Squares and railway bridge
- Leisure West Plaza
- Longford River Walk
- Feltham East Green Spaces
- Feltham Parklands
- Hanworth Air Park
- Upper Crane Park

The resulting policy approach: The WoB Plan

- In the WoB, the strategy is to support growth and alleviate deficiency partly through the provision of new parks, such as at Heathrow Gateway

and Rectory Farm. It is acknowledged, however, that these sites are expected to be delivered at the end of the plan period, or beyond the plan period. Therefore, the Council proposes to provide enhanced access to the Bedfont Lakes Country Park, as well as closer integration between new and existing communities in this part of the borough, and the country park.

- There are a number of Green Belt releases proposed in the plan area which are being proposed to help the borough meet its development requirements. At these sites, the council will (a) seek to deliver high-quality open space on-site and enhanced connections with adjacent open spaces and green corridors, and (b) seek contributions from development on these sites to compensatory improvements to the existing Green Belt.
- The Council will also support initiatives to enhance land being designated as MOL. Many of these projects will be those encapsulated in the Colne and Crane Valley Green Infrastructure Strategy. In particular, this strategy identifies a number of practical measures to enhance the quality of open spaces in the area, such as in the Crane Corridor, Hounslow Heath, Feltham Marshalling Yards, Hanworth House and Park, East Bedfont Lake and Bedfont Lakes Country Park. The MOL assessment carried out by Arup as part of the Council's Green Belt Assessment has also identified opportunities for conserving, enhancing or restoring parcels and elements within parcels which they had recommended for redesignation as MOL.
- The Council will also protect areas of local open space and require developments to improve and contribute to new areas of open space, with a focus on areas of deficiency.

7.12 The plan therefore translates this approach into policy, and in doing so it set out the following strategic objectives:

- **Strategic Objective 9 – To encourage active lifestyles through the provision of improved parks and play facilities connected by a network of green corridors for active travel.**
- **Strategic objective 10. To protect and enhance the borough's Green Belt, MOL, open green spaces and create more accessible MOL and open spaces.**
- **Strategic objective 11: To protect and enhance the quality, accessibility and function of green infrastructure and open spaces, whilst improving the ecology of the area and ensuring an overall net gain in biodiversity.**

7.13 The plan acknowledges that access to social infrastructure such as community leisure centres, health centres, good quality parks and open spaces is varied across the WoB, and that an increasing population will put more pressure on existing social infrastructure.

7.14 Key policy content in the plan which seeks to deliver the open space objectives are set out below:

- 7.15 **Policy WoB3 (Health and Wellbeing)** sets out that the Council will support a network of multifunctional open spaces and high-quality streets and public spaces. It will expect development to:
- contribute to improvements to existing and/or creating new high-quality safe and accessible public squares, amenity spaces, open space and public realm;
 - support the creation of a high-quality environment that reduces severance and promotes more physical activity by providing a high-quality, safe and convenient walking and cycling network, connecting new development with surrounding neighbourhoods and open spaces;
 - support development that involves the retention and improvement of open spaces (including playing pitches, and children's play spaces);
 - contribute to improvements of existing and/or new high-quality safe and attractive open spaces, public realm, public squares and amenity spaces.
- 7.16 The plan review proposes the release of Green Belt sites having considered that exceptional circumstances are demonstrated in a number of cases to help the borough meet its development requirements. Notwithstanding that, the network of open spaces needs to be consolidated, and investment directed to them, particularly from new development, the policy says, to ensure they are of high quality with very good facilities. Increases in population in dwellings with limited private amenity spaces increase the need for public spaces, while cuts in funding for maintenance put further pressure on open spaces.
- 7.17 **Policy WoB4 (Green Belt, Metropolitan Open Land and Open Space)** states that the council will continue to work with its partners and key stakeholders to provide new, enhanced and well-integrated open spaces and green infrastructure that provides for a range of functions, serving people and nature across the WoB.

The Council will:

- Work with partners to ensure that green infrastructure in the WoB contributes to the All London Green Grid and green loop. New and enhanced green infrastructure and open spaces will be protected, promoted and delivered in a way that ensure that they are well connected and provide a range of functions;
- Work with partners and key stakeholders to protect and improve the quality, function, activities and offer of open spaces in and around the area
- Improve the quality and biodiversity value of existing open spaces

Development will be expected to

- Contribute where land is released from the Green Belt to compensatory improvements to the remaining Green Belt land
- Protect existing local open space and contribute to the creation of new open spaces, with focus for areas deficient in access to nature, play areas and publicly accessible recreational open spaces

- Contribute to delivery of a high-quality, well-connected network of multifunctional publicly accessible Green Belt, MOL, open spaces and waterways for walkers and cyclists and proposals set out in open space strategy and masterplans.

7.18 Developers will be expected to consider green infrastructure and open space provision early in the design process, in terms of its spatial layout, functionality, quality of design and microclimate and long-term management arrangements. They will need to demonstrate how their scheme compares to the London Plan Urban Greening factor and the accompanying Green Points system. The policy sets an urban greening factor score of 0.2 for predominantly industrial development, 0.3 for mixed employment and commercial development and 0.4 for predominantly residential development, reflecting latest mayoral guidance.

7.19 The Place Policies in the plan also seek to ensure delivery of the open space objectives.

7.20 **Policy P1 (Feltham Place Policy)** says:

- Proposals should support and/or contribute to delivering the enhancement of existing parks and waterways and promoting better access to and links between existing green space in Feltham including Feltham Green, Feltham Parklands and Hanworth Air Park.
- The creation of new high-quality green open space at Feltham Marshalling Yard is supported, with a range of landscaped areas of a naturalistic character, including wetland areas, woodlands and open grasslands, and improving pedestrian/cycle access into and around the park, linking to an enhanced route along the River Crane and its surroundings;
- Development at Feltham East should be required to provide new green space, including a central green space, neighbourhood pocket green space and playing fields.

7.21 **Policy P2 (Bedfont Lakes Neighbourhoods)** says proposals should:

- Promote community health and active living with the provision of both built and outdoor community space
- Provide public spaces that are inclusive and accessible to all users
- Ensure developments compliment the surrounding green space and wetland areas by providing green links and protective green buffers at the eastern extent of South Bedfont neighbourhood and along the southern border of the Bedfont Gardens neighbourhood.
- Enhance the watercourse of Bedfont Lakes Country Park and improve the cycling and pedestrian network that links the neighbourhoods to the park, proving natural green corridors that serve as wildlife corridors and support biodiversity
- Securing contributions from developments on de-designated Green Belt sites to deliver a high-quality, well-connected network of multifunctional publicly accessible parks and open spaces and accessibility of remaining Green Belt land in the borough.

7.22 **Policy P3 (Heathrow Gateway):** Heathrow Gateway is a site which is proposed to be safeguarded for future development, contingent on strategic

transport infrastructure being provided to serve the site and make it a sustainable location. For open space, the place policy:

- Supports the delivery of a high-quality and accessible new park (Mayfield Park), where the design would make reference to and provide information about, the Neolithic causewayed enclosure it is situated upon. A new sports and leisure open space would also be provided.
- Seeks the delivery of a network of well-connected and varied open spaces
- Supports the enhancement of the quality and condition of watercourses and create links with surrounding green spaces such as Bedfont Lakes Country Park
- Seeks to ensure developments contribute towards compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in the borough.

7.23 **Policy P4 (Airport Business Park)** says proposals should;

- improving access and connections to surrounding sports and recreational facilities and open spaces including the allotments, expanded Hatton Cemetery and the Hounslow Urban Farm;
- Enhancing the river corridors and quality and condition of watercourses such as the River Crane, Duke of Northumberland's River and the Longford River
- Contributing towards compensatory improvements to the environmental quality and accessibility of remaining Green Belt and MOL land in the borough.

7.24 **Policy P5 (Cranford and Heston)** says proposals should:

- Provide an enhanced public realm and public spaces
- Enhance connections between green spaces such as Airlinks Golf Course and Osterley Park and to the national cycle route along the Grand Union Canal
- Contribute towards compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in the borough
- Seek opportunities for enhancements and improvements to existing parks and waterways in and around the area, including Brabazon Road open space.
- Engaging the community in the delivery of a new park at Rectory Farm.

7.25 Site allocation policies for the key sites also require the on-site open space improvements identified where appropriate.

8. Local open spaces proposed for development

8.1 The plan reviews are proposing to release four designated local open spaces for development. Two of these are former allotment sites, and the following section provides a justification for releasing these sites.

Allotments provision and release of disused/former sites

8.2 Overall, the council's open spaces study finds that the borough currently does not meet the standard recommended by the National Society of Allotment and Leisure Gardeners (NSALG) for allotment provision, which is 20 allotments per 1,000 households, which equates to 0.25ha per 1,000 population. There is currently 57ha in provision compared with 67ha which would be required under the standard.

8.3 However, the study finds that a more accurate measure of need for allotment provision is demand identified through waiting list figures. It sets out the following breakdown of the known number of plots, vacancies and waiting list numbers for each analysis area:

Table 2: Summary of allotments provision in Hounslow borough

Analysis area	Plots let	Vacant	Waiting list
<i>Chiswick area</i>	606	8	88
<i>Isleworth and Brentford area</i>	211	20	99
<i>North Central</i>	104	20	49
<i>South Central</i>	338	60	71
<i>West Area</i>	430	97	68
Hounslow Borough	1,689	205	375

Source: Open Spaces Study 2018

8.4 So it can be seen that, across the borough, there are more individuals on the waiting list than vacant plots available, and that the Chiswick area and Isleworth and Brentford have particularly high waiting list numbers.

8.5 The study finds that there are two sites which are currently unused as allotments but are known to be former allotments, and one further site understood to be not in use. These are:

- Green Lane (3.09ha) (former allotments) – this is understood to have not been in use as allotments for around 30 years. It is currently classified as inaccessible natural and semi-natural greenspace, which means it is not counted towards the hectareage of open space for the purposes of calculating deficiencies and standards. It is not a designated statutory allotment and is not classified as an allotment site;
- James Street (0.47ha) (former allotments) – this is understood to have not been in use as allotments for over 20 years. It is adjacent to the existing Glenwood Road Allotments. It is not a designated statutory allotment.

- Heath Road Allotments (0.92ha) (not in use) – this is currently understood to be not in use. It is adjacent to the Stanley Road and Inwood Road allotments.
- 8.6 The assessment of local demand for allotment provision can be used to help inform whether these former allotment sites are still required.
- 8.7 As can be seen from the table above, there are 205 vacant plots in the borough against a waiting list of 375, indicating that demand outweighs supply. In theory, the disused/former allotment plots could supply 179 plots so, combined with the vacant plots, could offer a total of 384 plots, thereby meeting the waiting list number. However, in reality, an individual in the east of the borough is unlikely to be willing to travel to the west of the borough in order to access a plot. Consequently, a more local level of analysis is needed to determine the need for the disused/former sites.
- 8.8 All three disused/former sites are located within the South Central Analysis Area. If vacant plots are firstly looked to be occupied as a priority, this would leave 11 individuals on the waiting list in the South Central Area. The 179 plots which could in theory be offered by the disused/former sites could therefore help to meet this localised demand. The sites may also help to some extent meet some instances of demand from relevant parts of the North Central area and Isleworth & Brentford area. However, retaining all three sites would create a localised surplus of supply, as the number of plots would exceed the waiting list demand.
- 8.9 Therefore, the study recommends that disposal of some of the disused/former allotment provision should be considered. The sale receipts and/or developer contributions arising from any disposal should then be used to help with the reinstatement of the other remaining disused/former sites provision (i.e. access and quality improvements), it recommends, as well as potentially helping to provide additional opportunities in other areas of the borough.
- 8.10 The study notes that, given their location to existing allotment provision, Heath Road and/or James Street would constitute the most efficient forms of provision for provision for retention and reinstatement as active allotments. Given that James Street has not been used for a lengthy time period, it recommends that the preference should therefore be to retain the Heath Road site. At 0.9ha, the site could provide approximately 37 plots (based on 0.025 ha per plot), it finds. This could therefore help meet the waiting list demand for the South Central area and also almost all of the demand for the North Central Area (once the number of vacant plots has been subtracted), it says.
- 8.11 The Council is therefore accepting this recommendation, and considers that the most appropriate strategy for the former/disused sites would be to focus efforts to reinstate allotments on the Heath Road site. Given the fact that the other two sites - Green Lane and James Street – have been disused for such a long time and that neither of these are designated as statutory allotment sites (and the former is not classified as an allotment site), the Council considers that this constitutes grounds justifying their release for development. It is therefore proposing to release Green Lane (SA45) for

industrial development (B2/B8) and James Street (SA89) for housing development. Receipts from site disposal and CIL would be able to be directed towards allotment re-provision.

Other local open spaces proposed to be released

- 8.12 The Council is also proposing two further local open spaces to be released for development, on the grounds that they are inaccessible and surplus to requirements. The rationale for these releases is set out below.

SA73: Land at Nene Gardens (0.3ha)

- 8.13 This site constitutes open wasteland at the corner of a larger local open space adjoining the Crane Park Primary School, and just opposite a larger recreation ground. Given that it is not accessible to the public, this land does not bestow any special open space role, and is not counted towards the hectareage of open space for the purposes of calculating deficiencies and standards in the council's open spaces audit, for any typology.
- 8.14 It lies in the West Area of analysis for the study, and this has been found not to be quantitatively deficient in any typology of open space, and not deficient by accessibility for amenity greenspace.
- 8.15 It is also considered that this site is not of a size, type or location that would assist in alleviating any requirement for open space as a result of growth in the West of Borough local plan review.
- 8.16 The Council therefore considers this land to be surplus to requirements for open space, under the terms of local plan policy GB2, and is proposing to release this site for housing.
- 8.17 Site requirements here include that development should provide an attractive and sensitive boundary to adjacent open space which maintains a sense of openness and enables greater access for occupiers of both new and existing development. Development proposals should deliver contributions which support significant enhancements to the quality and amenity of adjacent local open space.

SA75: Land to the rear of HCC Sports and Social Club (0.5ha)

- 8.18 This site constitutes former tennis courts behind the HCC Sports and Social Club. These are understood not to have been open to the public for many years, and are in a dilapidated state. The site was previously located adjacent to a larger area of open space, but planning permission was granted in 2016 (Planning application reference: 00519/D/P5) for a special educational needs school on the basis of very special circumstances.
- 8.19 Part of this justification was the need for this facility but part was that the local open space was of low quality. The school has since been constructed, and this leaves the HCC Sports and Social Club site further isolated. Given that the tennis courts are not open to the public and have not been used as courts for many years, the Council considers that this can also be assessed as local open space of low quality.

- 8.20 The Council's Playing Pitch Strategy states that the borough has a good level of existing supply of tennis courts, taking into account the provision of new courts with floodlighting at Gunnersbury Park. There is sufficient court supply in the central and west areas, although more investment will be needed to improve the quality of some of the courts in these areas to address further demand. The courts at Feltham Park and Lampton Park are identified as priorities for enhancement.
- 8.21 It says (p36) that the existing supply of maintained public tennis courts in parks (both free to access and pay and play) should be retained and sustainable operating models continue to be explored for the smaller sites as appropriate, for example, through agreements with nearby community clubs, coaches or specialist operators.
- 8.22 Where park courts are of particularly low quality and are found to attract no use or interest from clubs or operators, options for their replacement at accessible strategic hub sites with ancillary facilities and through securing and promoting new public access to courts out-of-hours on high school sites should be considered.
- 8.23 The strategy concludes that there is no needs case for the reinstatement of any tennis courts in the borough that are currently closed. Disused tennis courts in the borough should be considered for another sport or recreation use where a local need is established.
- 8.24 The Council considers that, given the above conclusions, the site can be regarded as surplus to requirements for tennis court provision. It also considers that the site's small size and isolated location following the construction of Oaklands School would make it unviable for the consideration of other sporting or recreational provision.
- 8.25 Given all these factors, the Council considers that the loss of this local open space is justified, and that the site should be allocated for new homes (ten units).

9. Next Steps

Green Infrastructure Strategy

- 9.1 The Colne & Crane Valleys Green Infrastructure Strategy (September 2019), which was produced by the Crane Valley Partnership in combination with other stakeholders, identifies a range of projects which have the potential to enhance the quality of green space in the borough, including its accessibility and environmental quality. The Council therefore believes it is an appropriate strategy for identifying the compensatory improvements which should be delivered as a result of releases of Green Belt land for development in the borough.
- 9.2 The projects identified for Green Belt land in Hounslow borough are set out in the table below (in some cases the projects are summaries of those which appear in the Green Infrastructure Strategy) – on some of these projects work is already in preparation or underway:

Table 3: List of improvement projects identified in Green Infrastructure Strategy

Land area	Green Belt parcel	Project
LC117	GA2	A4 crossing: Provide a pedestrian crossing and wayfaring enhancements at the A4 road bridge in Cranford.
LC201	GA3	M4 mitigation, including SUDS scheme to intercept pollution from road.
LC202	GA5 (part)	Cranford Countryside Park: opportunity for café and enhancements to park, as well as education centre (some projects underway). Create a visitor hub for the Crane Valley in this central location. Other potential heritage and environmental improvements identified.
LC204	GA6	Huckerby's Meadows and Cranebank Meadows: Conserve and enhance local wildlife reserves including the functioning floodplain.
LC104	GA7	A30 and Piccadilly line crossing: Create new connection at the major blockage in the middle Crane. Bridge link needed to connect Causeway open space and Huckerby's Meadows.
LC109	Various	Road crossing enhancements. Enhancing crossings to connect key green spaces along the River Crane corridor.
LC209	GA10 (part)	Heathrow balancing ponds: Continued biodiversity enhancements at ponds.

LC210	GA8 (part)	Green Lane Wetlands: Conserve existing wetland habitat and improve wildlife and flood-balancing potential. Take opportunity to extend habitat where possible. Link with the work already undertaken here by London Wildlife Trust.
LC108	GA8 (part)	As above – also facilitate sensitive public access.
LC109	GA23 (part)/GA9 (part)	As LC109 above.
LC213	GA24 (part)	Crane corridor and eastern bank near Hounslow Heath: Creating green links between key assets of Crane Corridor and Hounslow Heath including connections with local housing estates and schools. Various potential improvements identified.
LC214	GA24 (part)	Hounslow Heath: Conserve and enhance Hounslow Heath local nature reserve, SINC and lowland heathland habitat.
LC211	GA23	Donkey Woods and Brazil Mill Woods: Conserve and enhance Donkey Wood and Brazil Mill Wood including enhanced wet woodland and riverside habitats. Enhanced access required through the site and linking it to nearby areas of deprivation. Create links to the heritage story, e.g. through interpretation of nearby heritage features – Blast Mounds, Baber Bridge, mill site.
LC109	GA23/24 to GA22	As LC109 above.
LC218	GA22	Feltham Marshalling Yards: Create new connectivity where currently there is a blockage between lower and middle Crane corridor. Major opportunity to create a new high-quality green open space with a range of landscaped areas of a naturalistic character, including wetland areas, woodlands and open grasslands. Improve pedestrian/cycle access into and around the park, linking to an enhanced route along the River Crane and a better connection across the river with Godfrey Way.
LC223	GA21	Hanworth House and Park: Conserve and enhance Hanworth Park, establishing a more diverse landscape experience. Various improvement opportunities identified.
LC115	GA21 (links)	Feltham to Hanworth Park link.
LC114 (links)	GA21 (links)	Harlington Road underpass.

LC224	GA17, GA16 (part). GA15 (part incl section proposed for release)	East Bedfont Lake, Raleigh Park and London Diocesan Lands: For the SINC, improve management for biodiversity including potential for new tree planting. Improve quality of Raleigh Park including play equipment/green gym and signposted circular walking route. Improve link between east and west parts of the site. Potential opportunity for events space/new facilities e.g. picnic areas/play/football and activities linked with adjacent Young Offenders Institute/local community hub.
LC222	GA16 (western section)/GA15 (western section)/GA14 (southern section) – NB in South Colne section	Bedfont Lakes Country Park: Conserve and enhance country park/local nature reserve and Princes Lakes Metropolitan SINC. Opportunity for improving existing facilities and creating new education centre for use by local community groups, schools, training.
LC217	GA13	Mayfield Farm and Water Treatment Works: SINC and SAM sites designated for Romano-British settlement/part of a causewayed enclosure. Enhance biodiversity, opportunity for future public access/tree planting dependent on future agricultural or other land use. Scope to interpret scheduled remains. Aim to improve management and interpretation of the SAMs.
LC106	GA11	Hounslow Urban Farm and Bedfont Urban Spaces: Improve landscape quality and experience. Biodiversity enhancements and links with nearby spaces, opportunity to create/enhance wildflower meadow. Opportunity for education related to nature and animals linking with Hounslow Urban Farm. Improve access from Hatton Cross station, opportunity to provide a link to Duke's River. Hounslow Urban Farm and Bedfont Urban Spaces: Improve landscape quality and experience. Biodiversity enhancements and links with nearby spaces.

Arup MOL Assessment (2017) – identified actions

9.3 As part of Hounslow's Green Belt Assessment, consultants Arup also developed a strategy and recommendations in relation to either conserving,

enhancing or restoring parcels and elements within parcels which they had recommended for redesignation as Metropolitan Open Land. For two of these parcels, the Council is proposing to reject the proposal for redesignation to MOL and to retain the land within the Green Belt. For the remainder, the Council is proposing either to redesignate the land as MOL or to retain the land within the Green Belt.

9.4 Irrespective of whether these parcels are redesignated as MOL or remain within the Green Belt, the Council believes these recommendations are also relevant for drawing up actions for compensatory improvements to these areas linked to nearby areas of land which have been removed from the Green Belt for development.

9.5 The strategy and recommendations for these areas are summarised below:

Table 4: Summary of Arup report recommendations from MOL Assessment

Area reference	Area name	Summary of strategy and recommendations
GA2	Crane Corridor (between the Grand Union Canal and North Hyde Road)	Enhance, Restore. Significant potential for restoration and enhancement. Located on the route of both the London Loop and Hillingdon Trail. Maintenance of the vegetation and creation of a riverside path to enable public access would have the potential to improve recreational and biodiversity value.
GA3	Crane Corridor (between North Hyde Road and the M4)	Conserve, Enhance. The recreational value of the parcel could be enhanced through exploring the potential to open the north-eastern parcel of land to the public. Expanding the parcel's network of paths combined with the redirection of the London Loop and Hillingdon Trail could increase the off-road proportion and the quality/recreational experience of these trails. The biodiversity value of the northern part of the parcel could be enhanced through increasing the maintenance of vegetation, for example providing clearings in the woodland scrub.
GA7	Crane Corridor (between Causeway and Great South West Road)	Conserve, Enhance. The strong tree-lined boundary to the parcel's industrial development should be maintained to retain separation for the woodland Crane's river corridor. Signage to the northern access of the parcel could be improved to identify the direction of the next part of the River Crane's recreational

		corridor. In addition, elements such as benches could be added to encourage extended use of the space beyond a linear walking route.
GA8	Land east of the River Crane (between Causeway and Staines Road)	Enhance. Derelict land along the River Crane has great enhancement potential as a recreational and biodiversity resource. Opportunities include habitat improvement and extension of wetlands as noted in the Hounslow BAP, and the creation of a path network to offer public access.
GA9	Land west of the River Crane (between Causeway and Staines Road)	Conserve, Enhance. The riverside park 'Donkey Wood' should be conserved for its recreational, biodiversity and historical value, which could be improved by the following small-scale changes: replacement of broken boardwalks to improve accessibility, extend the wet woodland habitat as suggested in Hounslow's BAP and further interpretation of the parcel's historical importance.
GA21	Hanworth Park	Conserve, Enhance. The grade II-listed Hanworth House is on the heritage at risk register but presents a possible opportunity (subject to business case) in the context of Heritage Lottery Fund (HLF) conservation grant funding and restored links to the park to benefit the identity of the wider Hanworth Park. The vegetation diversity of Hanworth Park should be retained to conserve its ecological value. Derelict land on the eastern edge of the parcel should be restored as part of Hanworth Park, subject to a needs assessment and business case.
GA22	Leitrim Park/Pevensey Road	Conserve, Enhance, Restore. The northern part of the parcel has great recreational potential through restoration of post-industrial land and improved connectivity both into and through the area. Installation of recreational facilities, such as sports pitches and children's play facilities, would improve this further. Subject to a needs assessment and business case, the local recreational value of open grassland off Uxbridge Road could be improved through installation of formal

		<p>facilities such as sports pitches and children’s play, as it currently functions as a recreational route rather than a destination in itself.</p> <p>Land along the Crane River should be maintained for its high ecological value and recreational value.</p>
GA23	Hounslow Heath (west of the River Crane)	<p>Conserve, Enhance.</p> <p>The local ecological and historical value of the parcel should be conserved. Entrances to the parcel are recommended for improvement to enhance the recreational experience and usage, through better maintenance of vegetation which currently obscures paths and lighting of the underpass to the south.</p>
GA24	Hounslow Heath	<p>Conserve, Enhance.</p> <p>Whilst the parcel has a strong path network and information posts, enhanced signage including replacement of trail way-markers would improve legibility and visitor experience.</p> <p>Conserve the diverse, rich landscape which provides a strong sense of identity, and the continuing maintenance of the varied vegetation pattern: heathland, grassland and mature mixed woodland.</p>

General approach to compensatory improvements

- 9.6 In order to help complete or deliver these projects, and therefore to reflect the advice in government policy on securing compensatory improvements to the Green Belt, the Council is including a requirement in Policy WOB4 that, where Green Belt releases are proposed, contributions towards the enhancement of remaining Green Belt land (and land which has been designated from Green Belt to MOL if this proposal is taken forward) will be sought from development proposals on de-designated Green Belt land. The policy requires the provision of compensation for losses of Green Belt as a result of development and land use change, to improve quality and public access to nearby Green Belt and MOL.
- 9.7 Hounslow Council will draw up further detailed mechanisms for defining, calculating and securing the contributions from development proposals, along with a strategy for delivering the improvements, and this will be set out in a future supplementary planning document.
- 9.8 Some of the projects above relate to land which is itself being proposed to be released from the Green Belt. In these cases, the project and objective identified provides guidance for on-site development proposals, such as which elements of the land are important to be protected and which elements

should be avoided or mitigated, such as biodiversity habitats. Such requirements would be in addition to the off-site contributions to compensatory improvements to the remaining Green Belt land.

Next Local Plan Review

- 9.9 Following the adoption of the GWC Plan and WoB Plan, the Council will embark on a borough-wide local plan review. This will be informed by an updated evidence base on open space needs across the borough, and will formulate a strategy for planning growth so that it contributes to improvements to existing open spaces as well as delivering new high-quality open spaces where opportunities arise.
- 9.10 Part of this evidence base will include a borough-wide Green Infrastructure Strategy and an updated Open Spaces Assessment.

10. Sustainability Appraisal

10.1 The Integrated Impact Assessment (IIA) supporting the plan incorporates a sustainability appraisal of the topic policies, place policies and site allocations. With regards to open space, it provides the following assessment:

Great West Corridor

10.2 The IIA report notes that the key proposals for open space, including enhancements to local parks such as Boston Manor Park, facilitating the delivery of new high-quality public squares and open spaces creating better connections from open spaces, rivers and canals to neighbourhoods and workplaces. It says these will have significant benefits for the quality of the public realm, for health and wellbeing, townscape quality and the historic environment, air and noise quality and a range of other elements.

10.3 Enhancements to green infrastructure networks in the area will also have a range of benefits for local, borough-wide and sub-regional ecological networks, it says.

West of Borough

10.4 The IIA notes that the WoB Plan has a strong focus on green and blue infrastructure enhancements across the WoB. The study notes the green infrastructure proposals in Feltham, Bedfont Lakes Neighbourhood, Heathrow Gateway, Airport Business Park and Cranford & Heston.

10.5 It states that the multifunctional enhancements to green infrastructure networks will have significant benefits for the quality of the public realm, for health and wellbeing, townscape quality and the historic environment and noise quality and a range of other factors.

10.6 Enhancements to green infrastructure networks in the area will also have a range of benefits for local borough-wide and sub-regional ecological networks, it says.

Appendix 7 Letters submitted by Chelsea and Westminster NHS Foundation Trust



Chelsea and Westminster Hospital
NHS Foundation Trust

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Dear Mr Matthew

Proposed Residential Development at Park Road, Isleworth

On behalf of the Chelsea and Westminster Hospital NHS Foundation Trust, I am writing in **support** of the proposed residential development at Park Road, Isleworth. The Trust has written in support of the development before, at the previous application and appeal stages of the planning process.

It remains our intention to agree terms with the applicant Northumberland Estates to lease, subject to gaining planning permission, approximately 30 of the proposed 80 dwellings for NHS hospital staff accommodation. We anticipate this lease being for a period of 30 years at the outset.

Our need for good quality residential accommodation in close proximity to the Hospital has not changed since the previous application. Fit for purpose housing is in very short supply, particularly where apartments can be shared by staff wanting to rent property. We have to offer flexibility and by committing to a long term 'block booking' of well configured housing, we will be better placed to offer shorter tenancies where necessary and also attract and retain NHS staff at the Hospital.

Transport costs and journey times are also a major issue for our key worker staff and the fact that the scheme is adjacent to the Hospital is a considerable benefit, especially for shift workers, where a better quality of environment can be offered.

Similar to the previous proposal, we understand that Northumberland Estates will be offering affordable accommodation in the form of discounted rents, which would be supported by the NHS Trust and the Hospital staff.

Hopefully the revised scheme has addressed the concerns of the community and our own requirements can be taken into account by the Council to assist with the future running of the Hospital.

Yours sincerely,

David Butcher
Director of Estates & Facilities, Chelsea and Westminster Hospital NHS Foundation Trust

Cc Kiri Shuttleworth, Principal Planning Officer



West Middlesex University Hospital



Chelsea and Westminster Hospital

NHS Foundation Trust

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24th August 2021

Planning Application Ref 00707/E/P120 Park Road, Syon

Dear Mr Nash

On behalf of West Middlesex University Hospital I write to up-date and confirm the position with regard to Park Road, Syon and proposals for residential development by Northumberland Estates.

By way of background West Middlesex University Hospital have had a longstanding requirement to provide key worker housing in proximity. This is a particular priority in order to retain and attract staff, enabling travel to be reduced, secure accommodation provided and to aid with essential shift work.

The Trust continues to support the development, which would provide significant public benefits.

The Trust is at Heads of Terms stage with Northumberland Estates on the basis of a long lease for 30 residential units as shown on the attached plan and schedule, and is committed, subject to Planning Permission to enter into an Agreement to lease and subsequent lease with NE. The West Middlesex University Hospital would use the homes to provide rental accommodation directly to key workers including NHS nurses, doctors, and other essential medical staff.

The inclusion of key worker accommodation within the S106 agreement would be acceptable to W.M.H, and ensure that accommodation is used for hospital staff as desired by W.M.H and Northumberland Estates.

I trust this information is of assistance.

David Butcher

Director of Estates & Facilities
Chelsea and Westminster Hospital NHS Foundation Trust

3.57 Schedule of Accommodation

The current design provides for 80 new homes, a total of 235 habitable rooms.

Affordable homes are provided in line with policy requirements – 43% by habitable room and 40% when measured by number of homes.
 Of this amount 59.4% are for Discounted Market Rent and 40.6% for London Living Rent, these percentage are calculated by unit.
 Of the affordable provision, 25% are 3 bed family homes, 41% are two beds and 34% are one bedroom homes.
 Five of the affordable homes are designed to accessible (fully adapted) wheelchair units to meet the Building Regulations M4(3) part 2(b). A further 3 affordable homes are to be delivered to Building Regulations M4(3) part 2(a).

The mix of homes proposed in this application is almost identical to the that in the 2016 application, with the exception that this application increases the number of family-sized homes in response to the above stated demand and a proportion of homes are now to be allocated for key workers in the adjacent hospital.

All homes are to be tenure blind in all aspects, in both elevation and layout. The diagram and schedule opposite provide full details of mix and tenure location.
 Affordable homes are mainly located at the south of the site to have access to private gardens as they are family sized and also in block E. NHS Key worker homes are located along Snowy Fielder Way; the closest part of the site to the hospital. The 6 Market Rent homes are located in block F.

The 8 no. accessible homes are located with close proximity to where two no. lifts are located in cores or in the case of block E where it is possible due to flood levels to locate sleeping accommodation at ground floor. It is not possible for much of the site to locate sleeping accommodation at ground floor due to flood considerations and this has influenced the location and size of accessible in the scheme.
 There are 2 types of accessible homes provided; Part M Cat3(2a) and Part M Cat3(2b).
 — The 3no. 2B3P homes in block E are designed to Part M(Cat 3)2b
 — The 5no. 1B2P homes in Block G, and 1no. in block E are designed to Part M(Cat 3)2a
 All other homes are designed to comply with Part M Cat2 of the Approved Documents.

UNIT TYPE		Studio	1B	1B WC	2B	2B WC	3B	TOTAL	%Total	% Afford. / hab room	% of Aff. by unit
Area* (min. N/A m ²)		37	50	55	70	77	86				
Hab Rooms		1	2	2	3	3	5				
Discounted Market Rent	DMR		6	4	2	1	6	19			59.4%
Mix Unit			31.6%	21.1%	10.5%	5.3%	31.6%				
Hab Rooms			12	8	5	3	30	59		25.1%	
Hab Room %			20.3%	13.6%	10.2%	5.1%	50.8%				
Lon Living Rent	LR			1	8	2	2	13			40.6%
Mix Unit					61.5%	15.4%	15.4%				
Hab Rooms				2	24	6	10	42		17.9%	
Hab Room %				4.8%	57.1%	14.3%	23.8%				
NHS Key worker housing	NHS		3		24		3	30			
Mix Unit			10.0%		80.0%		10.0%				
Hab Rooms			6		72		15	93			
Hab Room %			6.5%		77.4%	0.0%	16.1%				
Market Rent	MR	1	11		6			18			
Policy mix		5.6%	61.1%		33.3%						
Hab Rooms		1	22		18			41		17.4%	
Hab Room %		2.4%	53.7%		43.9%						
Affordable total homes			6	5	10	3	8	32	40.0%		
			19%	16%	31%	9%	25%				
Affordable total habitable rooms			12	10	30	9	40	101	43.0%		
			12%	10%	30%	9%	40%				
OVERALL TOTAL HOMES		1	20	5	40	3	11	80			
Percentage		1.3%	31.2%	6.3%	50.0%	3.8%	13.4%				
TOTAL Hab Rooms		1	40	10	120	9	55	235			
		0.4%	17.0%	4.3%	51.1%	3.8%	23.4%				

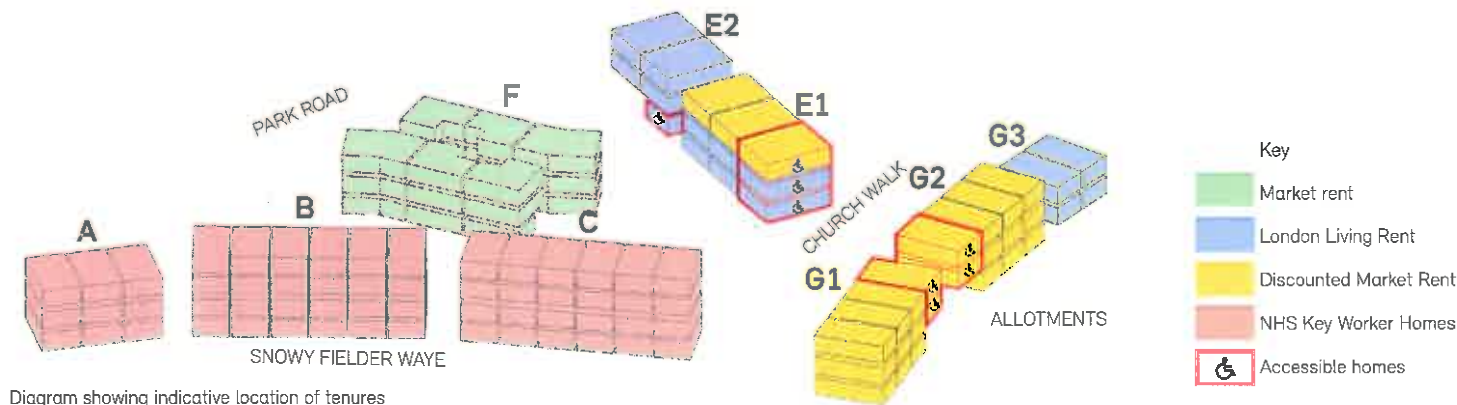


Diagram showing indicative location of tenures

Celebrating
60
years

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