

GREATER LONDON AUTHORITY

Good Growth

Eamon Cassidy
Deputy Planning Manager
Hounslow Council
Hounslow House
7 Bath Road
Hounslow
TW3 3EB

Our ref: GLA/4355a/RH/01
Your ref: 00535/250/P14
Date: 18 May 2020

Dear Mr Cassidy

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

250 Gunnersbury Avenue, London W4 5QB Local Planning Authority reference: 00535/250/P14

I refer to the copy of the above planning application, which was received from you on 8 April 2020. On 18 May 2020, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference GLA/4355a/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 105 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to

impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Harrison Bains, e-mail HarrisonBains@tfl.gov.uk, telephone 0230 7126 4787.

Yours sincerely

A handwritten signature in black ink that reads "John Finlayson" followed by a horizontal line.

John Finlayson
Head of Development Management

cc Tony Arbour, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Freya Turtle, Associate Director, Turley, Lacon House, 84 Theobald's
Road , London WC1X 8NL

250 Gunnersbury Avenue, Gunnersbury

in the London Borough of Hounslow

planning application no. 00535/250/P14

Strategic planning application stage 1 referral

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

The proposal

Demolition of the existing building and redevelopment to provide a mixed-use part 11, part 12 and part 13 storey building comprising light industrial space, flexible workspace, a cafe and 204 co-living units with associated communal shared space and amenity, including ancillary basement, car parking, cycle storage and plant.

The applicant

The applicant is **Tiger Developments Ltd.** and the architect is **ArchitecturePLB.**

Strategic issues summary

Principle of development: The introduction of B1 and B1(c) uses on this site could be supported subject to meeting light industrial specifications. However, the residential co-living use could compromise the protection afforded to the LSIS in London Plan Policy 4.4 and the Mayor's intend to publish London Plan Policies E6 and E7 and is therefore inappropriate (paragraphs 18-31).

Shared living and affordable housing: The applicant should increase the provision of communal kitchen and dining areas to ensure that there is enough provision to meet the amenity needs of residents and create a sense of community. The upfront cash payment towards the provision of off-site conventional affordable housing equivalent to 35% of the units at 50% of market rents falls short of the requirement of 50% of the units at 50% of market rents. Viability testing and early and late stage reviews are therefore required (paragraphs 32-49).

Urban design: A goods lift and revisions to the layout of the public realm are required, including provision of appropriate yard space. Agent of change principles have not been adequately addressed (paragraphs 50-61).

Heritage: The public benefits of the proposal should be clarified to allow officers to assess if these outweigh the less than substantial harm caused to the significance of the Gunnersbury Park Conservation Area and the Strand on the Green Conservation Area and Grade II and II* listed buildings within it (paragraphs 62-72).

Transport: Amendments are required to provide safe and efficient access to the car park and loading bay. The proposed public realm area should also be revised. Further information is required regarding Healthy Streets and cycle parking, and the proposed trip generation assessment should be revised (paragraphs 87-101).

Further information on **air quality, energy** and **green infrastructure** is required.

Recommendation

That Hounslow Council be advised the application does not comply with the London Plan and the Mayor's intend to publish London Plan, for the reasons set out in paragraph 105 of this report; but that the possible remedies set out in that paragraph of this report could address these deficiencies.

Context

1 On 8 April 2020, the Mayor of London received documents from Hounslow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 19 May 2020 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1C(c) of the Schedule to the 2008 Order:

- 1C(c) *“Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London.”*

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

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

Site description

5 The 0.12 hectare site lies within the Power Road Industrial Estate, which is designated as a Locally Significant Industrial Site (LSIS), in the London Borough of Hounslow. The site is located in the Great West Corridor Opportunity Area as identified in the Mayor's intend to publish London Plan.

6 The site is located on the corner of Power Road and Gunnersbury Avenue. It is currently occupied by a vacant three-storey building with parking to the rear, accessed via Power Road. The building was last in use as an office (Use Class B1a). The site fronts onto Gunnersbury Avenue and is located on the edge of the LSIS; bounded to the north, east and south by the Power Road Industrial Estate. The industrial estate comprises a range of uses including offices, light industrial units, retail warehouses, a car dealership, hotel and single residential building with a gym at ground floor.

7 The site is not located within a conservation area and does not contain any listed structures. There are conservation areas to the north, south, and east of the site. To the north Gunnersbury Park is a Grade II* registered landscape and contains the Grade II* listed mansions and lake with 18th century Grade II* Listed temple. The park also includes several listed walls, archways, gates, a conservatory, stables and monuments including Gunnersbury Cemetery. The park and surrounding residential dwellings form the Gunnersbury Park Conservation Area. To the east and south-east of the site are the Strand on the Green, Thorney Hedge and Wellesley Road conservation areas. These include the Grade II* listed Zoffany House as well as many other Grade II Listed buildings. The Kew Gardens World Heritage Site (which contains several listed buildings including the Grade I Listed Orangery and Grade I Listed Kew Palace) and Kew Green Conservation Area (which forms part of the buffer zone for the World Heritage Site) are located to the south of the site beyond the River Thames. The site does not lie within any strategic views

as identified within the Mayor's London View Management Framework SPG.

8 The site is located on the A406 Gunnersbury Avenue, which along with the nearby A4 Great West Road, Larch Drive and Chiswick Roundabout, form part of the Transport for London Road Network (TLRN). The closest part of the Strategic Road Network (SRN) is the A315 Chiswick High Road, approximately 200 metres to the south of the site. The proposed Cycleway 9 will follow Chiswick High Road, Wellesley Road and Key Bridge Road approximately 300 metres to the south of the site. The full scheme, routing between Kensington Olympia and Brentford, is expected to be completed by summer 2022

9 Gunnersbury station, which is served by London Underground (District Line) and London Overground (North London Line) services, is located approximately 800 metres to the east. Kew Bridge station, served by National Rail services, is approximately 650 metres to the southwest. The site is served by bus stops for five local bus routes within 450 metres of the site. Consequently, the site has a Public Transport Access Level (PTAL) of 3 on a scale of 0-6b, where 6b is highest, indicating a moderate level of accessibility.

Details of the proposal

10 The application is proposing the demolition of the existing building and redevelopment to provide a mixed-use part 11, part 12 and part 13 storey building comprising light industrial, flexible workspace, a cafe and 204 co-living units with associated communal shared space and amenity, including ancillary basement, car parking, cycle storage and plant. A breakdown of the proposed floorspace is provided in Table 1 below.

Floorspace by use (GIA)	Existing (sq.m.)	Proposed (sq.m.)
Flexible workspace (use class B1)	833	900
Cafe (use class A3)	0	61
Light industrial (use class B1c)	0	315
Co-living (sui generis)	0	9,776
Total	833	11,052

Table 1: Proposed floorspace

11 The light industrial floorspace (Use Class B1(c)) would be located on the ground floor, alongside the lobby for the co-living units and a cafe. 8 disabled car parking spaces would be provided in an undercroft at the eastern boundary of the site. The flexible workspace (Use Class B1) would be located on the first floor. Cycle parking, commercial storage, plant and refuse would be in the basement. The co-living floorspace would be located in the upper storeys of the building. At second floor would be a range of communal facilities, including communal lounges, private dining spaces, two kitchens, a gym and a cinema. Above this would be floors containing non-self-contained co-living units with kitchens and communal lounges provided on each floor. The applicant is also proposing an alternative configuration with all the kitchens and communal lounges provided on one floor. Roof terraces would be provided on the 2nd, 11th and 12th floors.

Case history

12 In April 2016, an application was submitted (reference 00535/250/P13) for full planning permission for the demolition of the existing office building and erection of an eight storey office building (7,671 sq.m.) with flexible office/ retail floorspace (421 sq.m.) at

ground floor level and basement car and cycle parking. On 13 January 2015, the application was considered by the Mayor at both Stage 1 and Stage 2 (GLA reference D&P/4355/01 & 02) and the report stated that the principle of increasing the office stock was strongly supported as there was authoritative strategic and local evidence of sustained demand for office based activities in the area. The Mayor subsequently advised that he was content for the Council to determine the case itself and permission was granted. The site has no other strategic planning history.

13 In April 2019 a pre-application meeting was held (reference pre-application report 4355a/JM) with the GLA for the redevelopment for the proposed development, which at that time was proposed to comprise a part 11, 12, and 13 storey mixed-use building with 898 sq.m. of commercial space at lower levels (use class B1) with 226 purpose built shared living units above. The applicant was advised that, in line with London Plan Policy 4.4 and draft London Plan Policies E3, E4 and E7 and the aspirations for the Power Lane Industrial Estate, the proposed B1 floorspace must be suitable for occupation by B1(c) uses, including SMEs and creative businesses. Furthermore, whilst the principle of co-locating shared living accommodation could be supported at strategic level, the acceptability of this element of the scheme was subject to full compliance with draft London Plan Policy E7(E) and support by the Local Planning Authority. The applicant was encouraged to continue engagement with the GLA, should the scheme progress, to ensure the co-living element delivers the highest residential quality. The applicant was also required to address issues relating to affordable housing; affordable workspace; urban design; inclusive design; climate change; flood risk, drainage and water; and transport.

Strategic planning issues and relevant policies and guidance

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

15 The following are also relevant material considerations:

- The National Planning Policy Framework (February 2019);
- National Planning Practice Guidance;
- The London Plan Intend to Publish version (December 2019);
- The Mayor's Affordable Housing and Viability SPG (August 2017);
- The Great West Corridor Local Plan Review: Volume 4 Pre-Submission Regulation 19 Consultation (2019); and
- The Hounslow Site Allocations Local Plan Review: Volume 2 Pre-Submission Regulation 19 Consultation (2019).

16 On 13 March 2020 the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.

17 The relevant issues and corresponding policies are as follows:

- Land use principle *London Plan; Intend to Publish London Plan;*
- Large-scale Purpose Built Shared Living *Housing SPG; Intend to Publish London Plan;*

- Urban design *London Plan; Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;*
- Historic environment *London Plan; Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; London's World Heritage Sites SPG*
- Inclusive design *London Plan; Intend to Publish London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Climate change *London Plan; Intend to Publish London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- Transport *London Plan; Intend to Publish London Plan; the Mayor's Transport Strategy.*

Principle of development

Opportunity Area

18 London Plan Policy 2.13 and the Mayor's intend to publish London Plan Policy SD1 provide that proposals in Opportunity Areas should seek to maximise density and contain a mix of uses. The site will be located in the Great West Corridor Opportunity Area in the Mayor's intend to publish London Plan. The Opportunity Area has an indicative capacity of 14,000 new jobs and 7,500 new homes. As such the proposal to introduce new jobs in the Opportunity Area is supported. However, whilst contributing to new homes targets, the proposed residential element of the proposal is not considered appropriate on LSIS as detailed below.

Industrial land

19 London Plan Policy 4.4 and the Mayor's intend to publish London Plan Policy E4 seek to manage London's industrial capacity through the managed release and/or intensification of industrial land. London Plan Policy 4.4 states that there could be limited release of industrial land in Hounslow. The Mayor's intend to publish London Plan Policy E4 sets Hounslow a revised policy to retain industrial floorspace capacity.

20 The Power Road Industrial Estate is a compact employment area with a variety of uses including car showrooms, converted office buildings, a hotel and a gym. The area is designated as a Locally Significant Industrial Site (LSIS), although the site is occupied by a former office building not industrial uses. London Plan Policy 4.4 states that local planning authorities should identify and protect LSIS and the Mayor's intend to publish London Plan Policy E6 states that boroughs should designate and define detailed boundaries and policies for LSIS and make clear the range of industrial and related uses that would be acceptable on LSIS. The area around Power Road is defined in the Hounslow Local Plan (2015) as LSIS providing industrial and warehousing capacity. The Power Road LSIS is retained in the Great West Corridor Local Plan Review (2019), which identifies a potential for 30,000 sq.m. of workspace. New development should provide for affordable offices and workspaces, especially for smaller and creative industries, as well as ancillary uses, such as print shops, cafeterias and cultural venues that support the employment profile and identity of the area. The use of the LSIS for industrial development is further supported at a local level by the Draft Hounslow Site Allocations Local Plan Review (2019), which allocates the nearby 36-110 Power Road for the development of a minimum of 10,360 sq.m. of B1(c) light industrial uses. The GLA has responded to the consultation on these documents, stating that the LSIS and

site allocation should also provide for new B2 general industrial and B8 storage/logistics uses.

21 Policy E7 states that proposals for the mixed-use redevelopment of LSIS may be considered but should be part of a plan-led or master-planning process and not through ad hoc planning applications. Policy E7 part D states that the mixed-use redevelopment proposals should also ensure that there is at least no net overall loss of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing. It is noted that following the Directions from the Secretary of State to remove the requirement for no net overall loss of floorspace, only limited weight can currently be placed on this part of the policy.

22 Officers note that the Council has previously approved an increase in office floorspace on this site, as well as within the surrounding LSIS. Notwithstanding this, the Mayor's intend to publish London Plan Policy E7 is clear that mixed use development, including office space, should only be introduced as part of a plan or master-planning approach. As such, the introduction of office space through an ad hoc planning application would have the potential to further compromise the protection afforded to this LSIS site and could trigger the need for a sequential test and town centre impact assessment. However, there is an existing office building on the site and the site has permission for an 8-storey office building. As such, given the material circumstances of the site, the provision of flexible B1 space would be acceptable in this instance.

Proposed use	Floorspace Quantum (GIA)	Plot ratio
Light industrial (B1c)	315 sq.m.	29%
Flexible B1 (B1a, B1b, B1c)	900 sq.m.	82% (if suitable for B1(c))
Total	1,215 sq.m.	110%

Table 2: Proposed employment floorspace with plot ratios

23 The introduction of new B1(c) light industrial uses on this site within the LSIS, as detailed in Table 2 above, is strongly supported. It is acknowledged that there is currently no B1(c) floorspace on the site and the proposal would introduce this as a new use. However, the provision of B1(c) uses is still insufficient to represent a no net loss of industrial capacity, which is defined as a plot ratio of 65% of B1(c), B2 or B8 industrial capacity in the Mayor's intend to publish London Plan Policy E7. It is nonetheless noted that applicant intends to re-provide some of the B1 space on the site to provide the remainder of the employment floorspace. It is also noted that the 65% plot ratio now carries limited weight following the Secretary of State's direction. Notwithstanding this, the applicant should ensure that the B1 floorspace is suitable for occupation by B1(c) uses in line with Policy E7 and the GLA's pre-application advice. At present, the B1 floorspace lacks access to goods lifts and appropriate ventilation. Furthermore, for both the B1(c) and B1 uses, appropriate yard space should be provided as detailed in the urban design section below. Provided that the employment floorspace is demonstrated to be suitable for light industrial occupiers and sufficient yard space is provided then the proposed provision would provide no net loss of industrial capacity and could be supported.

24 The applicant proposes to provide the ground floor B1(c) use as affordable workspace as required by the Great West Corridor Local Plan Review. This is supported

in accordance with the Mayor's intend to publish London Plan Policies E2 and E3. The provision and level of discount of the affordable workspace should be secured in the S106 agreement.

Co-location of residential and industrial uses

25 The proposed scheme would provide 204 non self-contained co-living units, which although in *sui generis* Use Class would provide residential accommodation. London Plan Policy 3.3 and the Mayor's intend to publish London Plan Policy H1 aim to increase housing supply by setting borough targets for new housing. The London Plan sets Hounslow a housing completion target of 8,222 units between 2015 and 2025. This is revised in the Mayor's intend to publish London Plan to 17,820 units between 2019/20 and 2028/29. To achieve these housing targets, the London Plan and the Mayor's intend to publish London Plan emphasise the need to optimise potential housing delivery on brownfield sites through higher density residential development. Co-living units can contribute towards meeting the 10 year housing targets, on the basis set out in paragraph 4.1.9 of the Mayor's intend to publish London Plan.

26 The Mayor's intend to publish London Plan Policy H16 seeks to manage the development of large-scale purpose-built shared living developments. This policy sets out criteria that such developments must meet, which includes being well-connected to local services and employment by walking, cycling and public transport, and detailed considerations regarding the quality of living accommodation and access to private and shared facilities within the development. The development site would be within walking distance of Gunnersbury and Kew Bridge stations and is well-connected to surrounding pedestrian and cycling routes; as such the principle of co-living development in this area could be supported in strategic terms.

27 However, this mixed use residential development would be located within an LSIS, which is protected from inappropriate uses through London Plan Policy 4.4 and the Mayor's intend to publish London Plan Policy E6. The Mayor's intend to publish Policy E7 states that proposals for the mixed-use redevelopment of LSIS including residential units should only be considered as part of a plan-led or master-planning process and not through ad hoc planning applications.

28 As detailed above the site forms part of an LSIS and the Council intends to retain this status in its Local Plan Review. The Council has clearly set out that the Power Road LSIS is suitable for light industrial uses in its adopted Local Plan. This is reinforced by the Great West Corridor Local Plan Review and the draft site allocation for the nearby 36-110 Power Road. It should also be noted that as part of the consultation on these documents the Mayor argued that they should be strengthened further by requiring B2 and B8 industrial uses within the LSIS. The Local Plan documents do not consider residential as an appropriate use on the LSIS and so the LSIS is considered to be protected against this use in line with London Plan Policy 4.4 and the Mayor's intend to publish London Plan Policy E6. As such there is no plan-led approach that would allow for mixed-use residential development.

29 The applicant has also not set out a master-plan led approach for the LSIS developed in collaboration with the Council and the GLA. It is acknowledged that previous approvals within the LSIS have introduced a mix of uses in this area and that this could raise issues for future industrial development. Officers recognise the benefits

of mixed use development to supporting the delivery of industrial floorspace; however, this cumulative development does not constitute a masterplan and so does not justify further residential development in LSIS. Without a masterplan the implications of introducing residential development have not been properly considered and could further compromise the future development of the LSIS with appropriate B1(c), B2 and B8 industrial uses.

30 Therefore, on balance the introduction of residential uses could compromise the protection afforded to the LSIS by London Plan Policy 4.4 and the Mayor's intend to publish London Plan Policies E6 and E7 and is therefore inappropriate. The local planning framework also does not support the introduction of residential uses within the Power Road LSIS. Therefore, the proposed mixed use residential development is considered to be contrary to policy.

Summary

31 The introduction of B1 and B1(c) uses on this site could be supported provided that design changes are made to ensure the development is suitable for light industrial occupiers. However, there is no plan-led or master-planning approach to the redevelopment of the LSIS that would allow for residential development. As such, the residential co-living use could compromise the protection afforded to the LSIS in London Plan Policy 4.4 and the Mayor's intend to publish London Plan Policies E6 and E7.

Large-scale purpose-built shared living

32 The qualitative and quantitative residential quality of co-living proposals is of paramount importance to their acceptability and to protect the amenity and quality of life of the future residents. The Mayor's intend to publish London Plan Policy H16 sets out criteria for the design and management of shared living developments, as set out below:

- be under single management;
- the units are available for rent with minimum tenancy lengths of three months;
- communal facilities and services are provided that are sufficient to meet the needs of residents;
- the private units contain adequate functional living spaces and are not self-contained homes;
- a management plan is provided.

33 The Mayor's intend to publish London Plan Policy D4 also requires that all proposals exceeding 30 metres high and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. Given that the proposed building is over 30 metres in height, a management plan is also required detailing day-to-day servicing and deliveries, longer-term maintenance implications and the long-term affordability of running costs and service charges in line with paragraph 3.4.9 of the Mayor's intend to publish London Plan.

Management

34 The applicant has confirmed that the proposal would be under single management. Furthermore, tenancies would be between 3 and 12 months; this is

supported and should be secured within the S106 agreement. The applicant has also provided a management plan that provides details of security arrangements, staffing, emergency management and fire safety, disciplinary procedures, procedures for renting a room, building services and maintenance, traffic management and a pool cycle scheme. Further details on how the long-term affordability of running costs and service charges will be achieved are required. The final management plan should be secured by condition.

Private internal accommodation

35 Whilst Policy H16 of the Mayor’s intend to publish London Plan acknowledges there are currently no minimum internal space standards for the type of residential product proposed, it states that units should be appropriately sized and laid out to provide adequate functional living space for residents. In this respect, GLA officers recognise that an appropriate balance should be struck in ensuring rooms benefit from sufficient space and living facilities, whilst also ensuring the units are not self-contained studios in Class C3 use.

36 The proposed residential development would comprise entirely of 204 non-self-contained co-living units. A breakdown of the proposed unit sizes is provided in Table 3 below and would comprise units ranging in size from 20 sq.m. to 30 sq.m., with the larger units proposed to meet the 10% wheelchair user requirements. The co-living units would contain a double bed, storage, desk and chair, limited kitchenette incorporating a sink, hob and fridge and an en-suite shower, toilet and sink. Overall, the layout and quantum of private internal space within rooms accords with the requirements set out in Policy H16. A restriction limiting each unit to single-occupancy should be included within the S106 agreement to avoid overcrowding.

Co-living Unit Sizes	No. of Units	Percentage
Studio – 20 sq.m.	107	52%
Studio – 21 sq.m.	8	4%
Studio – 22 sq.m.	32	16%
Studio – 23 sq.m.	18	9%
Studio – 24 sq.m.	18	9%
Studio – 26 sq.m.	11	5%
Studio – 30 sq.m.	10	5%
Total	204	100%

Table 3: Proposed co-living unit sizes

37 The applicant has introduced obscured glazing in the central communal amenity spaces, which will help reduce overlooking and is supported. Whilst it is acknowledged that most units would have a good outlook, most of the proposed units are single aspect and around 6 units per floor would be north facing. As detailed below the level of communal amenity provision means the proposal does not yet provide enough compensatory multi-aspect spaces. As such, the quality of the private amenity provision is not yet supported.

Shared communal amenity space

38 Paragraph 4.16.5 of the Mayor’s intend to publish London Plan also states that a crucial part of shared living proposals is creating a sense of community. As such,

buildings should be designed to promote social interaction and engagement between people. The Mayor's intend to publish London Plan notes that this can be achieved through incidental meeting spaces, sufficiently sized shared communal amenity spaces and spaces for use by the local community. Communal amenity spaces should include convenient to access kitchens, dining rooms, lounge areas, as well as laundry and drying facilities and a concierge desk. Outdoor communal amenity space is also required.

39 In total, the scheme proposes 1,494 sq.m. of internal communal floorspace, which represents 7.3 sq.m. per room / occupant as detailed in Table 4 below. Communal amenity space would be provided on almost every floor within the development, except for the first floor which is solely B1 employment floorspace. At ground floor would be a concierge and cafe area and at second floor would be a range of communal facilities, including communal lounges, private dining spaces, two kitchens, a gym and a cinema. Above this would be the floors containing the non-self-contained co-living units with kitchens and communal lounges provided on each floor.

	Total (sq.m.)	Average per person (sq.m.)
Internal communal space ¹	1,494	7.3
External outdoor communal space	436	2.1

Table 4 – internal and external communal amenity space (GIA)

40 In total, the applicant proposes 11 kitchens, excluding the two private dining rooms, which also contain kitchens but must be booked to use. Kitchens would be conveniently located on every floor and shared with communal living and dining space, which is supported. However, officers estimate that there is only one kitchen work station for every 14 people.² This is insufficient provision, considering the likely length of time people would be cooking and dining over the limited period of a weekday evening. The applicant should clarify the number of work stations and the location of food storage and set out its assumptions on how many people would be able to use the kitchens and dining spaces within the development in one sitting. The applicant should aim to provide enough communal kitchen and dining space available for all residents to prepare and eat a meal on any weekday evening. Further accessibility information demonstrating that the kitchen spaces are suitably accessible for wheelchair users is required. As such, whilst officers are satisfied that the amenity spaces are conveniently located, it is not yet clear that the shared communal amenity spaces are sufficiently sized and so the design of these spaces is not yet supported.

41 The applicant is also proposing an alternative configuration with all the kitchens and communal lounges provided on one floor. However, this is not supported as it would mean communal amenity space is not conveniently accessible. Furthermore, locating all the kitchen spaces on one floor is likely to be difficult to manage in peak times.

42 The number of units per core per floor varies between 11 and 22, significantly exceeding the benchmark of 8 units per core in the Mayor's Housing SPG. However, GLA officers recognise that this particular standard is based on self-contained housing

¹ This figure includes the cafe, lobby reception, cinema, gym, kitchen/dining, lounges, games and laundry areas.

² This is estimated as the number of work stations on the 3rd floor is not provided. Officers have assumed that two work stations are provided (one in each kitchen) on this floor.

and it is noted that longer corridors could allow for the provision of more communal amenity space, which has a larger footprint than each co-living unit. However, as detailed above the applicant must provide sufficient communal amenity space before the provision of a significant number of units per core can be considered acceptable, subject to the applicant's management plan being secured within the S106 agreement.

43 Roof terraces would be provided on the 2nd, 11th and 12th floors. These would provide 436 sq.m. of amenity space, equivalent to 2.1 sq.m. per person. These external spaces would be south facing, which is supported. Given the limited size of the site and the proximity of Gunnersbury Park, officers consider that the provision of outdoor amenity space is sufficient to meet the needs of residents.

44 In total, the indoor and outdoor communal amenity space would be equivalent to 9.5 sq.m. per person, which is welcomed. However, the application should be revised to provide additional communal kitchen/dining facilities to improve both the quantum of the facilities and ensure all residents can prepare meals during evening periods. Currently, given that the overall quantity of communal spaces is considered inadequate, officers consider that the incentive to use the communal amenity space provided would be undermined.

45 In terms of laundry facilities, the laundry room appears to be located within the communal amenity space on the 2nd floor. This is likely to be very noisy and could make the amenity space unpleasant to spend time in. The laundry room should ideally be a separate room to avoid the noise impinging on the amenity of other communal spaces. The laundry room would be supplemented by a separate managed and paid-for linen service; the applicant should clarify the capacity of the linen store facility and the overall number of washing machines and dryers available per person.

Summary

46 Whilst the layout and quantum of private internal space within rooms would be of an acceptable standard, the proposed design is not yet supported as it does not provide enough communal amenity provision. The applicant should increase the provision of communal kitchen and dining areas to ensure that there is sufficient provision to meet the amenity needs of residents and create a sense of community.

Affordable housing

47 The Mayor's intend to publish London Plan Policy H16 states that large-scale purpose built shared living developments must make a cash in lieu payment towards conventional C3 affordable housing off-site. In this case on industrial land, this would be equivalent to 50% of the units as affordable housing at a discount of 50% of market rents. All large-scale purpose-built shared living schemes are subject to the viability tested route as detailed in the Mayor's intend to publish London Plan Policy H5 and the Affordable Housing and Viability SPG. However, in line with the Mayor's intend to publish London Plan Policy H16, should the development provide a contribution equivalent to 50% affordable housing at a discount of 50% of market rents then no late stage viability review would be required.

48 The applicant proposes an upfront cash payment towards the provision of off-site conventional affordable housing, equivalent to 35% of the units at 50% of market rents.

Whilst this offer is welcomed as a starting point it falls short of the requirement of 50% of the units at 50% of market rents for this type of application on industrial land as described in Policy H16 of the Mayor's intend to publish London Plan. The applicant has provided a viability assessment, which will be robustly interrogated by GLA officers to ensure the scheme delivers the maximum amount of affordable housing. The Council should confirm that it is acceptable for the affordable housing contribution to be made as an upfront cash in lieu payment and should secure this payment in the S106 agreement.

49 The requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the Council), as set out in the Mayor's Affordable Housing and Viability SPG and Policy H6 of the Mayor's intend to publish London Plan. A late stage review must also be secured should the affordable housing contribution remain less than a payment equivalent to 50% of units at 50% of market rents. GLA officers request early engagement with the Council and the applicant to ensure appropriate wording for review mechanisms within the Section 106 agreement.

Urban Design

50 London Plan Policies 7.1 and 7.4 and the Mayor's intend to publish Policies D1 and D2 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment.

Industrial intensification

51 The Mayor's intend to publish London Plan Policy E7 sets out that proposals for development on SIL should ensure that the industrial uses on the site are intensified with appropriate provision of space for servicing, that other industrial uses are not compromised in their operation, and include appropriate design mitigation with particular consideration to safety and security, minimising conflict between uses and users, design quality, agent of change principles, vibration, noise, air quality, dust, odour, emissions and potential contamination.

52 The applicant is proposing B1(c) light industrial floorspace on the southern side of the ground floor of the development, with B1 flexible commercial floorspace above. At present, the B1 floorspace lacks access to goods lifts and appropriate ventilation and so cannot be considered as industrial re-provision. Provided that the B1 flexible employment floorspace is demonstrated to be suitable for light industrial occupiers and sufficient yard space is provided, as below, then the proposed provision would provide no net loss of industrial floorspace and could be supported.

Layout and public realm

53 Officers question whether the B1(c) yard space is adequate, given the distance to the on-street servicing bay. There is no direct route to this bay and the main entrance to this floorspace is constrained by adjacent bike racks, landscaping and seating in the public realm and bollards fronting onto Gunnersbury Avenue. Officers appreciate that the site is very small but consider that addressing this issue is essential to the effective operation of the B1(c) floorspace. The applicant should revise the layout of the public realm to ensure that appropriate yard space has been provided for the B1(c) floorspace,

with flexibility to accommodate the B1 floorspace should this be used for light industrial uses.

54 As detailed in the transport section below, the proposals for the public realm do not align with the proposals to increase the footway along Gunnersbury Avenue to 3 metres. The proposed layout creates a partially private court for the development, which does not support the A406 improvements. The proposal would include a large number of street trees within the street scene, which whilst supported in principle, currently have the potential to hinder the movement of pedestrians. As such, the proposed public realm layout is not supported and should be revised.

Noise and agent of change

55 As detailed above, in line with the Mayor's intend to publish London Plan Policy D13, the applicant must also consider and mitigate for existing and proposed noise and other nuisance generating uses in a sensitive manner in new development under the agent of change principle. London Plan Policy 7.15 and the Mayor's intend to publish London Plan Policy D14 further require the mitigation and minimisation of the existing and potential adverse impacts of noise. Measures include good design to minimise potential nuisances, exploring mitigation early in the design stage and separating noise-sensitive uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

56 The applicant has carried out a noise assessment that reviews the impact of noise from the surrounding area on the development. This shows that the majority of noise affecting the development would come from road traffic noise along Gunnersbury Avenue. The applicant states that there would be little impact on noise from the existing uses within the LSIS. The Planning Statement claims that the existing residential and hotel uses on the LSIS already compromise the provision of further industrial uses and as such mitigation measures in anticipation of the further industrial intensification of the LSIS is not required. However, issues such as agent of change require comprehensive assessment to properly assess if sensitive residential uses can be introduced on LSIS. This is best achieved through a development plan-led or master-planning approach to redeveloping the LSIS in line with the Mayor's intend to publish London Plan Policy E7 rather than through ad-hoc planning applications. As such, the implications of the residential co-living development for the agent of change principle cannot currently be fully assessed.

57 Notwithstanding this, given the noise from Gunnersbury Avenue and to ensure adequate noise levels within the development the assessment recommends that windows are closed except for purge ventilation. Given the very high proportion of single aspect units and the need to address overheating as detailed in the energy section below, this would mean that residents would have limited options to cool their units, which is not supported. The proposed sound insulation between the proposed B1 flexible workspace and the co-living space should be secured by condition.

Height and massing

58 London Plan policy 7.7 and Policy D9 of the Mayor's intend to publish London Plan set out the criteria against which tall and large buildings should be assessed. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate

form of development in development plans and criteria against which impact should be assessed.

59 The applicant is proposing a building up to 13 storeys or 44 metres high. This exceeds the height parameters set out in the Great West Corridor Local Plan Review of between 24 to 29 metres at the higher end. It is noted that the building would generally be of a lower height to the buildings proposed at the B&Q Chiswick site (GLA reference GLA/4288/01) and would not exceed the indicative heights proposed for the Eastern Gateway landmark building at Chiswick Roundabout as set out in the Great West Corridor Local Plan Review. It is further noted that the proposal would be a similar height to the approved office development on this site. The proposed tall building also does not raise any strategic functional or environmental issues. However, the proposal would cause harm to the significance of nearby heritage assets that is not yet outweighed by its public benefits as set out below. The applicant should therefore address heritage matters before officers can consider the tall building acceptable in strategic terms.

Architecture

60 The proposed architecture is generally high quality consisting of a black metal plinth at ground and first floors and a solid red brick weave with metal cladding behind for the upper storeys, with the 12th storey consisting of metal cladding. Given the sensitivity of the neighbouring conservation areas, the Council should secure a high quality of materials by condition, including details of window reveals, ground frontages, soffits, rooflines and facing materials.

Fire safety

61 In accordance with the Mayor's intend to publish London Plan Policy D12, the applicant has produced a fire statement, produced by a third party suitable qualified assessor. The statement includes details of: the means of escape for all building users; features which reduce the risk to life, including sprinklers; access for fire service personnel and equipment; and access for fire appliances. Further information is required on fire safety with respect to construction methods and consideration of any potential future modifications to the building. The applicant should provide a fire evacuation lift within each core to assist in the evacuation of wheelchair users. The fire statement should be reviewed by Council Building Control officers and compliance secured by condition.

Heritage

62 The site is not located within a conservation area and there are no listed buildings within the immediate vicinity of the site. The area surrounding the site is in transition with a number of tall buildings granted consent or under consideration. Having regard to both the current and emerging context, the proposed development would be of a scale, relative to the generally low rise townscape of the immediate surrounding buildings, to potentially affect the setting of a number of designated heritage assets in the wider area.³

³ The heritage assets affected are: Thorney Hedge, Wellesley Road, Turnham Green, Kew Bridge, Kew Green and the Royal Botanic Gardens, Kew Conservation Areas; the Grade II and II* listed building group at Gunnersbury Park, the Grade II listed Kew Bridge station, the Grade II and I listed building group at Kew Bridge Pumping Station and the Grade II listed Kew Bridge; the Grade II* Registered Park and Garden at Gunnersbury Park; and the Royal Botanic Gardens Kew World Heritage Site.

63 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions “*should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*” and in relation to conservation areas, special attention must be paid to “*the desirability of preserving or enhancing the character or appearance of that area*”. If harm is identified, it should be given considerable importance and weight.

64 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Policy HC1 ‘Heritage conservation and growth’ of the Mayor’s Intend to Publish London Plan, as well as London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

65 London Plan Policies 7.10 and draft London Plan Policies HC2 and HC3 seek to avoid adverse impacts on World Heritage Sites or their settings. In particular, development should not compromise a viewer’s ability to appreciate the Outstanding Universal Value (OUV), integrity, authenticity or significance of these sites. Policy HC2 of the Intend to Publish London Plan further states that when considering planning applications, appropriate weight should be given to the provisions of World Heritage Site Management Plans. The Mayor’s London World Heritage Sites SPG (2011) gives guidance on the interpretation of setting and understanding of World Heritage Sites importance in contributing to an appreciation of Outstanding Universal Value and helps support consistency in decision making. It provides a framework for assessing the effect of development proposals and a guide for assessing the scale of change.

66 The site is located approximately 1 kilometre to the north-east of the principle northern boundary of the Royal Botanic Gardens Kew World Heritage Site, Registered Park and Garden and Conservation Area which contains a number of listed buildings, such as the Grade I listed Kew Palace. The site would also lie outside of the Buffer Zone surrounding the World Heritage Site and so would only have the potential to appear within its wider setting. World Heritage Sites are places of Outstanding Universal Value (OUV) to the whole of humanity and the effect of the development on the Kew Gardens designations is a key strategic consideration. The OUV of the Royal Botanic Gardens Kew World Heritage Site can be summarised as: its scientific and economic exchanges established throughout the world in the field of botany; advances to scientific disciplines, particularly botany and ecology; and its outstanding edifices and landscaping.

67 The proposal would be entirely obscured by mature vegetation or intervening development, or only visible outside of the immediate setting of the conservation area and the listed buildings and registered park and garden. As the development would not

otherwise affect these heritage assets it would therefore preserve their significance within the World Heritage Site. In terms of its impact on the World Heritage Site, in most views the proposal would appear obscured by mature vegetation and intervening development. The integrity of the site would not be affected, as the proposal would largely not be visible, and should it be seen would appear in the background of the wider urban setting of the site. The development is sufficiently distant from the World Heritage Site and its buffer zone to avoid harm to the authenticity of the site and to its OUV, which would be unaffected by the development. The development would therefore have a neutral impact on the OUV, integrity and authenticity and would represent a negligible neutral change to the setting of the Royal Botanic Gardens Kew World Heritage site. As such, the proposal would result in no harm to the OUV, integrity, authenticity or significance of the Royal Botanic Gardens Kew World Heritage Site. The proposal would also result in no harm to the significance of the Royal Botanic Gardens Kew Conservation Area, or its constituent listed buildings and registered park and garden.

68 Gunnersbury Park, a Grade II* listed Registered Park and Garden lies to the north west of the site and is located with the wider boundary of the Gunnersbury Park Conservation Area. The development is generally obscured by vegetation and would appear more distant in most views from the registered park and garden. As such, officers consider that the proposal would have a limited impact on the setting and would not otherwise affect the significance of the Grade II* listed Gunnersbury Park Registered Park and Garden, and so no harm is caused to its significance.

69 The Gunnersbury Park Conservation Area also contains Gunnersbury Cemetery, which lies to the immediate south of Gunnersbury Park Grade II* listed Registered Park and Garden and north west of the site. However, unlike views from the park, the development would be clearly visible and prominent in the background of views from within Gunnersbury Cemetery, rising distinctly above the tree line. The applicant has assessed the susceptibility of the cemetery to change as high, given that views across the cemetery to the south east currently have limited visibility of built form. It is noted that the proposal would be partially obscured by intervening cumulative development at the neighbouring proposed development at the B&Q Chiswick; however, the development on this site would still be prominently visible. Officers consider that there is a moderate adverse impact on the setting of the Gunnersbury Park Conservation Area. As such, less than substantial harm is caused to the significance of the Gunnersbury Park Conservation Area.

70 The proposed development would be visible above the roofline of existing low rise buildings in key views of the Strand on the Green Conservation Area, in particular from views from the pedestrian path on the south bank of the River Thames. In views from along the river path, the development would be visible above the roofline of the Grade II and II* Listed buildings of 64-71 Strand on the Green which forms the historic core of the Conservation Area. The proposal would slightly rise above the roofline of one of these buildings. This should be considered in the context of cumulative future development at Brentford Football Club scheme, 1-4 Capital Interchange Way and the Citadel scheme, and would be seen as part of this cluster of tall buildings. The proposal would not otherwise affect the significance of this conservation area. As such, given its height is significantly below the height of the other buildings within this cluster and would be seen within the context of other larger buildings emerging in the Opportunity Area, officers consider that the development cumulatively would have a minor adverse impact on the setting of the conservation area and the listed buildings within it. The proposal would not otherwise affect the significance of the conservation area. As such, the proposal would

result in less than substantial harm at the very lowest end of the scale to the Strand on the Green Conservation Area and to the Grade II and II* listed buildings within it.

71 The proposal has the potential to affect a range of other nearby conservation areas and listed buildings. On review of the applicant's TVIA, officers agree with the general assessment that the proposal would either be obscured, be of restricted visibility or lie within the context of an urban skyline with a minor, negligible or no impact on the settings of these conservation areas and listed buildings. Given this, and the fact that the proposal would not otherwise affect the significance of these conservation areas or listed buildings, no harm is caused to the significance of any other nearby conservation areas or listed buildings.

72 In accordance with paragraph 196 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets. As stated above, officers consider that less than substantial harm is caused to the significance of the Gunnersbury Park Conservation Area and the Strand on the Green Conservation Area and the Grade II and II* listed buildings within it. Given the issues raised in this report, particularly those relating to the principle of development and agent of change, the public benefits of the proposal should be clarified to allow officers to fully assess if the public benefits outweigh the less than substantial harm caused to these heritage assets.

Inclusive design

73 London Plan Policy 7.2 and the Mayor's intend to publish London Plan Policy D3 seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum) ensuring that developments can be entered and used safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and are designed to incorporate safe and dignified emergency evacuation for all building users. The applicant has provided details of the accessibility of the circulation spaces and entrances within the development; however little detail is provided on the accessibility of the shared communal amenity spaces. In particular, further detail should be provided on how the communal kitchens and dining areas would be accessible for wheelchair users.

74 Policy 3.8 of the London Plan and the Mayor's intend to publish London Plan Policy D5 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The proposal would provide 10% of the co-living units as wheelchair accessible, equivalent to 21 units. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Environment

Air quality

75 The application is for a major development within an Air Quality Management Area.

As such, in accordance with London Plan Policies 3.2 and 5.3, and 7.14 and the Mayor's Intend to Publish London Plan Policy SI1, an Air Quality Assessment has been provided. Policy SI1 states that this should take an Air Quality Neutral approach.

76 The development is Air Quality Neutral and thus complies with London Plan Policy 7.14 and the Mayor's intend to publish London Plan Policy SI1, with transport emissions below the relevant benchmark, and building emissions assumed to be zero through the use of air source heat pumps.

77 Adverse impacts on existing air quality have been screened out due to development-generated traffic being below the screening threshold for significant impacts. This conclusion is accepted based on the development-generated trip rate. The applicant is advised, however, that comparing the proposed trip rate to trips associated with the previous use is not appropriate, as the site has been vacant since 2014. Notwithstanding this, in this case the outcome of the assessment is unaffected.

78 The assessment that future occupants of the proposed development will not be exposed to elevated levels of nitrogen dioxide is accepted. However, further information is required before it can be determined occupants will not be exposed to elevated levels of PM10 before the development can be considered to comply with London Plan Policy 7.14 and the Mayor's intend to publish London Plan Policy SI1.

79 Conditions should be secured requiring compliance with the Non-Road Mobile Machinery Low Emission Zone for London during the construction phase and measures to control emissions during construction and demolition for a medium risk site, as outlined in section 9.1 of the applicant's air quality assessment.

Energy

80 In line with London Plan Policy 5.2 and Policy SI2 of the Mayor's intend to publish London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions in accordance with the energy hierarchy. It is considered that the co-living apartments have the facilities to be operated as dwellings to accommodate a single household. Therefore, such units should be classified as domestic for the purposes of meeting GLA energy policy, while the communal spaces and B1 workspaces should be assessed separately as non-domestic. Carbon emissions for domestic and non-domestic elements of the development should be presented separately. The applicant should revise its energy modelling, and carbon emissions presented to account for this. The applicant should investigate and adopt further passive measures to reduce the risk of overheating, connect the space heating to the communal heat network, provide additional photovoltaic panels and provide further detail on the proposed heat pumps.

Flood risk, drainage and water consumption

81 The site is less than 1 hectare in size and is located in Flood Zone 1 but would involve the change of use of the site to incorporate a higher risk residential use. A Flood Risk Assessment (FRA) has been submitted, which considers the risk of flooding from a range of sources. When mitigation measures are considered, the residual flood risk to the site is low. The approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and the Mayor's intend to publish London Plan Policy SI12.

82 The surface water drainage strategy for the proposed development complies with London Plan Policy 5.13 the Mayor's intend to publish London Plan Policy SI13. The proposed development also generally meets the requirements of London Plan Policy 5.15 and the Mayor's intend to publish London Plan Policy SI5. However, the applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

Green infrastructure and natural environment

Urban greening

83 London Plan Policy 5.10 and the Mayor's intend to publish London Plan Policy G5 state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.

84 The provision of green roofs on the development and trees within the public realm is supported. In accordance with Policy G5 of the Mayor's intend to publish London Plan, the applicant should calculate and provide the UGF score for the proposed development and meet the minimum specified target of 0.4 for predominantly residential developments. A drawing showing the surface cover types and accompanying UGF calculation should be submitted prior to Stage 2.

Biodiversity

85 London Plan Policy 7.19 and the Mayor's intend to publish London Plan Policy G6 state that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain.

86 The applicant proposes the loss of the existing area of green space along Gunnersbury Avenue, which could result in a loss of biodiversity. The applicant has carried out an ecological assessment of the site that has found that the site is unlikely to be a habitat for bats or amphibians but does support nesting birds; as such the impacts of development on these nesting birds should be managed by an appropriate condition. The applicant proposes swift bricks, sparrow terraces and bat bricks to compensate for the loss of suitable nesting and roosting habitat for birds and bats, which is supported and should be secured by condition. The applicant should show that biodiversity net gain will be achieved as a result of the development.

Transport

Great West Corridor

87 This Great West Corridor Local Plan Review is supported by the Strategic Transport Study which was published in May 2019. The study outlines a package of potential transport interventions proposed in the Great West Corridor area and any new development coming forward within the area will be expected to contribute towards these.

Walking, cycling and Healthy Streets

88 The applicant proposes to provide a new public realm consisting of seating and landscaping within the public highway, along the site frontage with Gunnersbury Avenue (A406). However, the existing shared-use footway fronting the site will be widened to 3 metres as part of a major road safety scheme on the A406 and the public realm proposals do not consider these improvements. The proposed layout creates a partially private court for the development, which does not support the A406 improvements, and therefore does not comply with the Mayor's intend to publish London Plan Policy T2 and Mayor's Vision Zero Action Plan.

89 The applicant has prepared an Active Travel Zone assessment. The applicant has prepared an Active Travel Zone assessment. Officers would expect the applicant to provide mapping to display the number of people killed or seriously injured along the routes to key active travel destinations and demonstrate how the scheme will deliver local improvements. The applicant should give particular consideration of the existing walking and cycling environment on Power Road, which requires substantial improvement to become a pedestrian and cycle friendly route. The Council and applicant should discuss with TfL officers the financial contribution towards the development of Cycleway 9 and/or enhanced cycle facilities linking the site to the proposed Cycleway 9 route.

Deliveries and servicing

90 Refuse collection, deliveries and servicing are proposed via a loading bay on Power Road. The Mayor's intend to publish London Plan Policy T7 requires servicing and deliveries to be made off-street, with on-street loading bays only used where this is not possible. The proposed on-street loading bay is designed to fit the dimensions of a 7.5 tonne box van; this is not acceptable and should be enlarged to fit the dimensions of a Hounslow Council refuse vehicle. Furthermore, the servicing bay is located a significant distance from the entrance of the B1(c) industrial unit, which creates challenges for servicing industrial uses within this unit. An off-street conveniently accessible loading bay should be provided.

Car parking

91 The proposed development is car-free with the exception of Blue Badge parking on-site. 7 Blue Badge spaces are provided for the co-living / residential element, equating to 3% of units provided with a Blue Badge bay from the outset, in conformity with the Mayor's intend to publish London Plan Policy T6.1. One Blue Badge space is provided on-site for the non-residential element in accordance with the Mayor's intend to publish London Plan Policy T6.5. The provision of active electric vehicle charging points for 20% of the car parking spaces, and 80% passive provision for the remaining spaces, must be secured by condition.

92 Swept path analysis demonstrates that access to the parking bays is extremely tight. Officers are not satisfied that the southern-most bay can be safely accessed; therefore, the car parking layout requires amendment.

93 A S106 clause restricting residents from obtaining permits for the local controlled parking zone would be supported. The car park should be monitored, managed and enforced through a Parking Design and Management Plan secured by condition. The plan

should demonstrate how further potential residential Blue Badge spaces will be provided and managed as per policy requirements.

Cycle parking

94 160 long-stay cycle parking spaces are provided for the co-living development, which falls short of the comparable minimum requirement of 204 spaces for C3 dwellings, as per Policy T5 of the Mayor's intend to publish London Plan. An additional 18 cycles will be available for residents to rent as part of a pool bike scheme. Further details on the pricing, management and monitoring of the scheme, and the types of bikes to be used should be secured by condition. Given the nature of the co-living accommodation and the relatively transient nature of residents, the proposed level of provision is considered acceptable, subject to the provision of high quality cycle parking in line with the London Cycling Design Standards (LCDS). 36 long-stay spaces are provided for the commercial element and 12 short-stay spaces are provided for the overall development, in accordance with the minimum standards of the Mayor's intend to publish London Plan.

95 A greater proportion of Sheffield stands should be provided for the co-living development, to maximise inclusive cycling and compensate for the shortfall in the number of spaces. All cycle parking must be in accordance with the LCDS as per Policy T5 of the Mayor's intend to publish London Plan. In addition to the showers provided, lockers and changing facilities for cyclists associated to the commercial use should also be provided. Further detail is also required on the routes for cyclists to access cycle parking locations.

Trip generation and impacts

96 The proposed trip generation assessment should be revised. The applicant is likely to have under-estimated the number of rail / underground trips and the associated impacts on the local infrastructure. A revised assessment of public transport impacts is therefore required.

97 The development is likely to result in a significant uplift in London Underground and London Overground trips over and above the existing capacity of Gunnersbury station. There is already significant concern regarding Gunnersbury station's capacity and it is therefore important for officers to fully understand the implications of this development on the station to understand what mitigation will be required. Gunnersbury station currently does not have Step Free Access (SFA); a developer contribution will also be sought towards this.

98 It is noted that Kew Bridge station is identified within the Great West Corridor Strategic Transport Study as having capacity constraints during peak times. Officers would also support a contribution towards SFA at this station.

Delivery and Servicing and Construction Logistics Plans

99 The submitted Delivery and Servicing Plan (DSP) is generally acceptable; however, the plan should be amended in accordance with the above comments regarding servicing access. The final DSP should be secured by condition.

100 The submitted Construction Management Plan is generally acceptable. A Detailed Construction Logistics Plan, prepared in accordance with TfL's guidance, should be

secured by condition.

Travel plan

101 The submitted framework Travel Plan is generally acceptable. A full travel plan should be secured through the S106 agreement.

Local planning authority's position

102 Hounslow Council officers are currently reviewing the application. It is understood that Council officers are likely to recommend refusal. A committee date for the application has not yet been set.

Legal considerations

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

Financial considerations

104 There are no financial considerations at this stage.

Conclusion

105 London Plan and the Mayor's intend to publish London Plan policies on Opportunity Areas; industrial land; affordable housing; large-scale purpose-built shared living; design; heritage; inclusive design; sustainable infrastructure; green infrastructure; and transport are relevant to this application. Having regard to these policies the application complies with some of these policies but not with others as per the schedule below:

- **Principle of development:** The introduction of B1 and B1(c) uses on this site could be supported subject to meeting light industrial specifications. However, the residential co-living use could compromise the protection afforded to the LSIS in London Plan Policy 4.4 and the Mayor's intend to publish London Plan Policies E6 and E7 and is therefore inappropriate.
- **Large-scale purpose-built shared living:** The applicant should increase the provision of communal kitchen and dining areas to ensure that there is enough provision to meet the amenity needs of residents and create a sense of community.

- **Affordable housing:** The upfront cash payment towards the provision of off-site conventional affordable housing equivalent to 35% of the units at 50% of market rents falls short of the requirement of 50% of the units at 50% of market rents. Viability testing and early and late stage reviews are therefore required.
- **Urban design:** A goods lift and revisions to the layout of the public realm are required, including provision of appropriate yard space. Agent of change principles have not been adequately addressed.
- **Heritage:** The public benefits of the proposal should be clarified to allow officers to assess if these outweigh the less than substantial harm caused to the significance of the Gunnersbury Park Conservation Area and the Strand on the Green Conservation Area and the Grade II and II* listed buildings within it.
- **Inclusive design:** Further detail should be provided on how the communal kitchens and dining areas would be accessible for wheelchair users. The proposal would provide 10% of the co-living units as wheelchair accessible, equivalent to 21 units. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.
- **Sustainable infrastructure:** The development would be Air Quality Neutral. Further information is required before it can be determined occupants will not be exposed to elevated levels of PM10. The co-living units should be classified as domestic for the purposes of meeting GLA energy policy. The applicant should revise its energy modelling, and carbon emissions presented to account for this. The applicant should also investigate and adopt further passive measures to reduce the risk of overheating, connect the space heating to the communal heat network, provide additional photovoltaic panels and provide further detail on the proposed heat pumps.
- **Green infrastructure and natural environment:** A drawing showing the surface cover types and accompanying UGF calculation should be submitted. The applicant should show that biodiversity net gain will be achieved.
- **Transport:** Amendments are required to provide safe and efficient access to the car park and loading bay. The proposed public realm area should also be revised. Further information is required regarding Healthy Streets and cycle parking, and the proposed trip generation assessment should be revised.

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