

GREATER LONDON AUTHORITY

Good Growth

Shane Baker

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London Borough of Hounslow
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TW3 3EB

Our ref: GLA/6554/01
Your ref: 01106/B/P137
Date: 7 December 2020

Dear Shane

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Tesco Superstore, Syon Lane
Local Planning Authority reference: 01106/B/P137

I refer to the copy of the above planning application, which was received from you on 29 September 2020. On 7 December 2020, the Mayor considered a report on this proposal, reference GLA/6554/01. 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 Mayor considers that the application does not fully comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 93 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 Lucy Simpson, e-mail LucySimpson@tfl.gov.uk

Yours sincerely

A handwritten signature in black ink that reads "John Finlayson" with a long horizontal flourish extending to the right.

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, MHCLG
Danny Calver, TfL
Duncan Matthews, Berkeley Group
Simon Roberts, WSP

7 December 2020

Tesco Superstore, Syon Lane

in the London Borough of Hounslow
planning application no. 01106/B/P137

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

Outline planning application with all matters reserved except access for the residential-led redevelopment of the site to construct up to 1,677 homes (35% affordable housing), between 3,000 and 5,000 sq.m. of flexible non-residential floorspace, together with public and communal open space, a mobility hub, associated access, bus turning, car and cycle parking, and landscaping, with building heights ranging from 2 to 17-storeys.

The applicant

The applicant is **St Edward** and the architect is **jtp**

Strategic issues summary

Principle of development: The comprehensive residential-led mixed use redevelopment of this out of town retail park site within an opportunity area is strongly supported (paragraphs 21 to 27).

Housing and affordable housing: 35% affordable housing by habitable room, comprising 66% intermediate housing and 34% London Affordable Rent. The cumulative affordable housing offer across this application and the linked Homebase application would ensure 35% affordable housing provision with a 50:50 tenure mix (by habitable room). The proposed tenure mix across both sites has been agreed with Council and GLA officers and complies with the Intend to Publish London Plan. The sites would be formally linked via S106 agreement. As such, the application is considered eligible for the Fast Track Route. Phasing and affordability levels should be set out and secured, together with an early stage review mechanism, grant funding provisions and off-site play space provision (paragraphs 28 to 42).

Urban design and heritage: The density, design and layout, residential quality and proposed height and massing is supported, subject to the design code and landscape strategy being appropriately secured. The application would cause less than substantial harm to the setting and significance of the Grade I listed Registered Syon Park, the Grade II* listed Registered Osterley Park and the Grade II listed Former Gillette Factory. The overall cumulative harm caused to these designated heritage assets could be outweighed by the proposed public benefits, subject to these being secured and detailed at Stage 2 (paras 43 to 72).

Climate change: The energy, drainage and urban greening strategies are generally supported subject to further information being provided on the energy strategy (paragraph 73 to 76)

Transport: Further work is required on the modelling of highway options to ensure that a preferred option can be identified and agreed. A bus contribution of £1,700,000 is required for both development sites to mitigate the impact on bus capacity. Further detail on the public realm, site access and walking and cycling improvements is required to ensure that these are safe and meet the requirements of Healthy Streets. The pedestrian and cycle connections between the two development sites should be improved. Car parking is acceptable and complies with the maximum standard in the Intend to Publish London Plan. Cycle parking would also meet the quantitative standard required in the Intend to Publish London Plan. Compliance with the London Cycling Design Standards (LCDS) should be secured. Further details are required on the Delivery and Servicing Plan (paragraph 77 to 90).

Recommendation

That Hounslow Council be advised that the application does not fully comply with the London Plan and the Intend to Publish London Plan, for the reasons set out in paragraph 93 of this report; however, the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 29 September 2020, the Mayor of London received documents from the Hounslow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Mayor's Intend to Publish 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 consideration in deciding what decision to make.

2 The application is referable under the following categories of the Schedule to the 2008 Order:

- *Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- *Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- *Category 1C: "Development which comprises or includes the erection of a building of...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; to take over the application for determination himself; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

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

Site description

6 The site is approximately 5.45 hectares in size and is located within the Great West Corridor Opportunity Area. It is bounded by Syon Lane to the south; MacFarlane Lane and two storey residential properties to the west; the Sky Campus to the north; and Grant Way to the east. The site comprises a two- storey Tesco Extra superstore, a surface car park (614 car parking spaces), petrol filling station and car wash facility, together with a rectangular open space to the north which is known as the Water Gardens. The existing Tesco Extra store contains approximately 11,582 sq.m. (GIA) of retail floorspace and 625 car parking spaces.

7 The site itself is not designated or allocated for any use in the adopted Local Plan; however, Hounslow Council's Local Plan Review (2019) proposes that the site is allocated for residential and retail uses. In planning terms, the existing supermarket constitutes an out of centre retail use. It is approximately 1 kilometre from Brentford Town Centre and over 2 kilometres from Hounslow Town Centre, which are the closest town centres.

8 The site has a Public Transport Access Level (PTAL) of 2, on a scale of 0 to 6b where 6b is the highest. Syon Lane National Rail station is located approximately 600m south west of the site

and is served by regular Southern Western Railway services to and from London Waterloo. Two bus routes serve the site. Route H91 provides east-west connection along the A4 Great West Road between West Hounslow and Hammersmith with up to 6 buses per hour in each direction. The H28 which provides local connection from a terminating bus stop within the site boundary and Hounslow East and Bulls Bridge roundabout in Hayes and is served by 3 buses per hour during the day. It is also proposed to extend the E1 bus route to Osterley Tesco when the Elizabeth Line opens. The Route H28 is also proposed to run along Syon Lane, rather than terminate at the site.

9 The site is not within a conservation area and does not include any Statutory listed buildings. There are a number of designated heritage assets both within close proximity to the site and in the wider surrounding area, with the A4 Great West Road home to a number of Art Deco buildings. The Gillette factory was built in 1937 and is Grade II listed, as are the lamp stands, lanterns and telephone kiosk outside the front entrance. It is buffered from the site by a tree lined green link which runs parallel to Grant Way. Syon Clinic, Westlink House, 911 Great West Road and the former National Westminster Bank building are also all Grade II listed. The Pavilion and Clubhouse to the west are Grade II listed.

10 The wider surrounding context also includes a number of designated heritage assets and landscape areas. To the west is Osterley Park, a Grade II* listed Registered Historic Park and Garden which falls within the Osterley Park Conservation Area and includes the Grade I listed Osterley House. To the north-west, Boston Manor Park falls within the Grand Union Canal and Boston Manor Conservation Area and includes the Grade I Listed Boston Manor House. To the west is the Spring Grove Conservation Area. Syon Park to the south is a Grade I listed Historic Park and Garden and falls within the Isleworth Riverside Conservation Area, which includes the Grade I listed Syon House. The Royal Botanic Gardens World Heritage Site is found further to the south-west on the other side of the River Thames. Old Deer Park is also found to the south of the River Thames and falls within the Old Deer Park Conservation Area. This stretch of the River Thames is also covered by the Hampton to Wandsworth Thames Policy Area.

11 The Sky Campus to the north comprises a 14-hectare hub of broadcasting, television and media production activities which is accessed from Grant Way via a controlled gated entrance. The campus falls with the Great West Road Strategic Industrial Location (SIL) which extends to include adjacent industrial premises on Harlequin Avenue, Shield Drive and along the Great West Road. A sports ground is located to the west of the site which includes playing fields, artificial grass pitches and a club house building. This open space is designated as Metropolitan Open Land (MOL) which extends further west towards Osterley Park.

12 Residential properties are found to the south and west of the site, which are predominantly two and three storey suburban semi-detached houses. The Boulder Academy is proposed to relocate from its existing site on London Road to a new purpose-built four-storey secondary school building on MacFarlane Lane to the north-west of the site. This new facility is expected to open in 2021, following Hounslow Council's decision to grant planning permission (LPA Ref: 01106/W/P9; GA ref: 4192).

Details of the proposal

13 The application seeks outline planning permission (with all matters reserved except access) for the demolition and comprehensive residential-led mixed use redevelopment of the site to construct:

- up to 1,677 homes (35% affordable housing by habitable room);
- between a minimum of 3,000 and maximum of 5,000 sq.m. of flexible non-residential floorspace (including commercial, business and service, non-residential institution space, community use and/or public house/ drinking establishment use);
- public and communal open space, car and cycle parking, and landscaping;
- an energy centre;

- enhancements to the existing Water Gardens, including a public route;
- a mobility hub, together with associated access, bus turning for the Route E1 and H28; and
- building heights ranging from 2 to 17-storeys (to a maximum height of 79.8 metres AOD).

14 The outline application is supported by a development specification document which sets maximum and minimum limits on the quantum of development, as well as confirming other key elements such as housing tenures, residential quality, open space, play space and other transport and environmental standards which would be achieved by future Reserved Matters Applications. The Proposed Site Access Plan is in detail. A range of parameter plans have been submitted which subsequent Reserved Matters Applications would need to accord with. These include ground and first floor use, maximum building heights, maximum development parcels, access and movement and public open space, podium and roof level communal open space, site levels and the location of the proposed energy centre. The application is also supported by a design code, which Reserved Matters Applications would need to accord with.

Background

15 The outline application forms part of a wider linked development proposal for the comprehensive redevelopment of both the Homebase and Tesco Extra sites on Syon Lane which are both being brought forwards by St Edward via separate planning applications which were submitted at the same time and have been subject to concurrent pre-application discussions. In combination, the proposals would see the existing Tesco Extra store relocated to the Homebase site as part of a separate linked application. This linked application seeks full planning permission for the residential-led mixed use redevelopment comprising 473 residential units and a 10,055 sq.m. new replacement Tesco store, together with 137 sq.m. of flexible commercial floorspace and 200 sq.m. of flexible community use, with associated car parking, access, servicing, landscaping and plant, with building heights ranging from 4 to 17-storeys (LPA Ref: 00505/H/P19; GLA Ref: 6553). In terms of phasing, subject to planning permission being granted on both sites, the applicant would deliver the proposed replacement Tesco store on the Homebase site first. Once this development has been completed and the store is open, the existing Tesco Extra site would be redeveloped. This would ensure continuity of trading for the existing Tesco.

Case history

16 On 5 September 2019, an initial GLA pre-application meeting took place to discuss the proposed residential-led mixed use development of the site, with the applicant, GLA, TfL and Hounslow Council officers. A further follow-up GLA pre-application meeting also took place on 24 June 2020. The GLA's pre-application advice notes strongly supported the proposed comprehensive residential led mixed use redevelopment of this out of town supermarket site and car park. The applicant's 35% affordable housing offer was Fast Track eligible, subject to the tenure mix being agreed with the Council and the two planning applications being formally linked via s106 agreement in the way set out by the applicant.

17 The revised illustrative masterplan for the site presented in June 2020 was strongly supported. This was considered to provide a more contextual, landscape-led approach compared to the previous masterplan, ensuring more sheltered and higher quality public spaces. The design, layout, height and massing of the scheme is supported and was considered to optimise the development potential and permeability of the site. Further information was, however, required for more detailed assessment in relation to the townscape, heritage and environmental impact. The applicant was encouraged to undertake a design review. Further information was required in relation to play space requirements and on-site provision and further ongoing discussion is required in relation to issues relating to transport and climate change

Strategic planning issues and relevant policies and guidance

18 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of the Hounslow Local Plan (2015) and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

19 The following are also relevant material considerations:

- The National Planning Policy Framework (2019)
- National Planning Practice Guidance
- The Intend to Publish London Plan (December 2019)
- The Secretary of State's 13 March 2020 Directions issued under Section 337 of the Greater London Authority Act 1999 (as amended) to the extent that these are relevant to this particular application they have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.
- The Mayor's Affordable Housing & Viability SPG (2017)
- Hounslow Local Plan Review – Great West Corridor (Regulation 19 pre-Submission Consultation) July 2019
- Hounslow Local Plan Review – Site Allocations (Regulation 19 pre-Submission Consultation) July 2019
- Osterley Park Conservation Area Appraisal (October 2019)
- Isleworth Riverside Conservation Area Appraisal (2002)
- Grand Union Canal & Boston Manor Conservation Area Appraisal (April 2018)
- Spring Grove Conservation Area Appraisal (Jan 2020)

20 The relevant issues and corresponding strategic policies and guidance are as follows:

- *Land use principles* *London Plan; Intend to Publish London Plan; Town Centres SPG;*
- *Housing and affordable housing; play space* *London Plan; the Intend to Publish London Plan; London Plan; Affordable Housing & Viability SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; the London Housing Strategy;*
- *Urban design and heritage* *London Plan; the Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;*
- *Inclusive access* *London Plan; the Intend to Publish London Plan: Accessible London: Achieving an Inclusive Environment SPG;*
- *Climate change* *London Plan; the Intend to Publish London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- *Transport* *London Plan; the Intend to Publish London Plan; the Mayor's Transport Strategy;*

Principle of development

Emerging Local Plan context

21 Whilst the site is not currently allocated for housing or designated for a particular use in the adopted Hounslow Local Plan (2015), it is put forward as a site allocation for residential and mixed use development as part of Hounslow Council's Local Plan Review (2019). The Council's draft allocation envisages two potential development scenarios: a minimum of 350 residential units is expected where the existing supermarket is retained on site; and a higher minimum expectation for 600 residential units would apply where it is possible to relocate the supermarket. This would contribute towards the Council's wider aspiration to deliver 7,500 residential units in the Great West Corridor between 2019 and 2034. The allocation also seeks a minimum of 780 sq.m. of retail (Class A1-A4) use, associated parking and enhanced public realm, including safeguarded unrestricted public access to the Water Gardens. It notes the need for any proposed development to incorporate agent of change principles, given the adjacent SIL and carefully consider heritage impacts.

Opportunity Area context

22 As set out above, the site is within the Great West Corridor Opportunity Area set out in the draft London Plan, having been indicatively identified as having potential for opportunity area status in the 2016 London Plan. In line with London Plan Policy 2.13 and draft London Plan Policy SD1, the proposed development should optimise potential residential and non-residential development capacity, provide an appropriate mix of uses and support wider regeneration and the provision of mixed and inclusive communities, whilst also recognising the role of heritage in place making. The draft London Plan sets the Opportunity Area an indicative capacity guideline for 7,500 homes and 14,000 jobs to 2041. The proposed development would respond positively to these broad policy objectives and would make a substantial contribution towards achieving the strategic planning aspirations in terms of housing delivery and place-making.

Housing supply

23 To meet housing targets, London Plan Policy 3.3 emphasises the particular importance of mixed use redevelopment of surplus commercial capacity. The need for existing out of town retail parks, supermarkets and associated surface car parks to deliver housing intensification and make a substantial contribution towards meeting London's housing need is set out in Policies H1, SD7 and E9 of the draft London Plan. The proposed scheme would make a very substantial contribution to meeting local and strategic housing targets through the demolition and comprehensive residential-led mixed use redevelopment of a low density supermarket site and associated surface car park and provision of up to 1,677 homes. As such, the application is strongly supported.

Non-residential use

24 The application seeks outline planning permission for between a minimum of 3,000 sq.m. of flexible non-residential floorspace in commercial, employment, education, non-residential institution, community, public house/ drinking establishment use, including the mobility hub, which would be limited to a maximum floorspace cap of 5,000 sq.m. Given the outline nature of the application, there is limited information available in respect of the type of uses proposed; however, the illustrative masterplan envisages a range of commercial retail, cafe/restaurant, public house/drinking establishment use, together with other community and leisure uses, including the potential for a pharmacy, GP and with a mix of small-scale uses and unit sizes proposed which seek to meet the demand generated by the residential units. The location of non-residential uses also aims to draw on the potential synergies with the adjacent Sky Campus, which currently operates as a relatively insular and gated business park, with few nearby amenities available off-site for employees. The illustrative masterplan and parameter plans envisage these non-residential uses being located on the eastern side of the site closest to Grant Way and generally clustered around the main public space ('the Clearing Piazza') and located in ground and first floor levels of Blocks A, B, C, K and H.

The provision of non-residential uses in this location would help to animate and activate the proposed public square which is strongly supported in design terms.

25 This overall land use strategy is strongly supported and would ensure an appropriate place making approach is followed, in line with the London Plan’s expectation for an opportunity area site such as this, which is of a substantial size. The quantum of non-residential floorspace would be of a broadly commensurate scale, given the residential density proposed and need to encourage sustainable patterns of movement and taking into account the site’s proximity to nearby town centres amenities. Compared to the existing situation there would appear be a substantial net reduction in retail floorspace on site. This is supported taking into account the site’s out of centre location and the town centre first approach set out in the London Plan and Intend to Publish London Plan.

Table 1 – existing and proposed retail floorspace (sq.m.) GIA

	Existing	Proposed	Net change
Homebase site	4,180	10,550	+ 6,370
Tesco site	11,582	1,000	- 10,582
Total retail	15,762	11,500	- 4,212

26 If the scheme provided the maximum quantum of flexible non-residential use sought (5,000 sq.m.), the overall net balance of provision of town centre uses proposed on the two sites and across both applications would be broadly neutral. The applicant has undertaken an impact assessment and sequential site assessment. This considers the cumulative combined net impact of the two linked application and concludes that there would be no adverse impacts on the nearby Hounslow Metropolitan Town Centre or the Brentford and Hanwell District Town Centres, The report also concludes that there are no suitable or available sequentially preferable sites for the new Tesco store. As such, GLA officers consider that the proposals are acceptable in terms of London Plan Policy 4.7 and Policy SD8. Given the flexible nature of the outline planning permission, a condition should be included to limit the maximum quantum of commercial retail use and other commercial uses.

Conclusion - Principle of development

27 To conclude, the principle of the comprehensive residential-led mixed use redevelopment of this out of town retail park site within an opportunity area accords with the land use principles set out in the London Plan and Intend to Publish London Plan and is strongly supported.

Housing and affordable housing

Affordable housing, viability and tenure mix

28 London Plan Policies 3.11 and 3.12 and Policy H5 of the Intend to Publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target for 50% of all new homes to be affordable. Policy H5 identifies a minimum threshold of 35% affordable housing (by habitable room), with a threshold of 50% applied to public sector owned sites and industrial sites where there is a net loss of industrial capacity. The application is subject to the 35% threshold for affordable housing, as the site comprises commercial land in retail use.

The Fast Track Route

29 To be eligible for the Mayor’s Fast Track Route, applications must meet the applicable affordable housing threshold (by habitable room), in line with the required tenure mix without public subsidy. Applicants must also seek to maximise affordable housing provision above the relevant threshold through the use of grant funding and, where additional affordable housing is provided above the relevant affordable housing threshold, the tenure mix requirements are flexible, as set out in Policy H7. In addition, an Early Stage Review Mechanism would need to be secured via Section

106, which should normally be triggered should an agreed level of progress on implementation not be made within two years of the date on which planning permission was granted.

Tenure split

30 In terms of tenure split, Policy H6 of the Intend to Publish London Plan sets out the Mayor's preference for at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate housing products, with the remaining 40% to be determined by the borough. There is a presumption that the 40% to be decided by the borough will focus on low cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance. In this case, GLA officers understand that Hounslow Council's adopted Core Strategy (Policy SC2) requires a 60:40 tenure split between social/affordable rent and intermediate tenure housing. GLA officers also note that the Council's draft Great West Corridor Local Plan review (2019) proposes a tenure split of 70% London Affordable Rent and/or social rent and 30% intermediate housing.

The applicant's affordable housing proposals

31 The application proposes up to 1,677 homes, of which, 561 homes would be affordable. This represents an affordable housing offer of 35% by habitable room and 35% by unit. The proposed affordable housing tenure mix would be 34% London Affordable Rent (by habitable room) and 66% intermediate.

32 The application is linked with the Homebase scheme referred to above (LPA Ref: 00505/H/P19; GLA Ref: 6553). This application has been submitted by the same applicant (St Edward) at the same time as this application, having been brought forwards through parallel pre-application process. The Homebase application proposes 473 residential units, of which 164 homes would be affordable. This represents 38% affordable housing by habitable room (35% by unit), which would be entirely comprised of London Affordable Rent units.

33 The cumulative affordable housing across both applications would be 36% affordable housing by habitable room, with an affordable housing tenure split of 50% London Affordable Rent and 50% intermediate housing by habitable room. This is summarised in the Table below:

Site	Tenure	Habitable rooms	% Affordable by habitable room
Homebase	Market	776	38%
	London Affordable Rent	476	
	Total	1,252	
Tesco	Market	2,814	35%
	London Affordable Rent	524	
	Intermediate	999	
	Total	4,337	
Cumulative	Market	3,590	36%
	London Affordable Rent	1,000	
	Intermediate	999	
	Total	5,589	

34 The tenure mix proposed on this application and the cumulative tenure mix proposed across both applications would comply with the minimum tenure mix requirements set out in Policy H6 of the Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG. Although the cumulative tenure mix (50:50) does not accord with the Council's current or emerging Local Plan affordable housing tenure mix requirements, nor does that proposed within this application (34:66),

35 The applicant has agreed the tenure mix with the Council prior to submission of the applications, subject to the details being fully secured via s106 agreement. The overall approach to affordable housing delivery across both sites was subject to discussion with GLA and Hounslow Council officers during the pre-application process. Prior to submission, both GLA officers and Hounslow Council planning officers agreed that the applications were eligible for the Fast Track Route and a Financial Viability Appraisal (FVA) would not be required at validation stage. The applicant has agreed to the principle of the two applications being formally linked via S106 agreement. As set out above, the phasing of the schemes would entail the replacement Tesco being constructed on the Homebase site first and the provision of 476 London Affordable Rent homes prior to commencement of development on the existing Tesco Extra site. This is a commercial requirement of Tesco to ensure continuity of trading but also enables the front-loaded provision of low cost rented accommodation across the two schemes within the earlier period.

36 On this basis, the application is considered eligible for the 'Fast Track Route' subject to the agreed level of affordable housing on all sites being secured via S106 agreement, together with an early stage viability review mechanism and a provision within the S106 agreement to ensure that the applicant fully explores the potential for grant funding to increase the level of affordable housing beyond the baseline level agreed. The phasing of affordable housing should be clarified and secured via the S106 agreement.

Housing affordability

37 Policy H6 of the Intend to Publish London Plan sets out the Mayor's preferred affordable housing tenures, which includes social rent/London Affordable Rent; London Living Rent and London Shared Ownership. The provision of London Affordable Rent is strongly supported and should be secured via Section 106 agreement, with rents capped at the Mayor's LAR benchmarks and restrictions on service charges.

38 London Shared Ownership units should be affordable to households on incomes up to a maximum of £90,000 a year and a range of affordability levels should be provided below the maximum £90,000 household income cap. Any intermediate rent products, such as Discount Market Rent (DMR) or London Living Rent, are subject to a maximum income cap of £60,000. Furthermore, all intermediate tenure households should not be required to spend more than 40% of their net income on overall housing costs, including service charges. The S106 should ensure that service charges are retained, in line with these affordability levels.

Housing mix

39 London Plan Policy 3.8 and Policy H10 of the Mayor's Intend to Publish London Plan state that new development should generally consist of a range of unit sizes. Policy H10 sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes housing need; the requirement to deliver mixed and inclusive neighbourhoods; the nature and location of a site in relation to town centres and public transport access; and the requirement to optimise housing potential; and the relationship between new build housing supply and demand within the existing housing stock. The proposed housing mix has not been confirmed and should be clarified and subject to further discussion, taking into account the considerations set out above.

40 Given the outline nature of the application, the development specification document includes minimum and maximum unit size mix parameters. These are set out below and are considered to provide an acceptable mix in strategic planning terms, taking into account the site location, PTAL

and other factors set out above. The submission suggests the provision of a range of housing typologies including two-storey duplex / maisonettes and terraced homes in defined locations, which is strongly supported.

	Market	Intermediate	Affordable Rent
	Min-Max	Min-Max	Min-Max
Studio	5% - 9%	5% -7%	0-5%
1-bed	30% - 36%	30% - 35%	22% -27%
2-bed	42% - 48%	58%-64%	39% -45%
3-bed	12% -16%	0% -5%	30% - 37%
4-bed	0% - 0%	0% - 0%	0% - 0%

Children’s play space

41 Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the Mayor’s Intend to Publish London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement.

42 The applicant has assessed the likely child yield within the development using the GLA’s updated play space calculator. This generates a total requirement for over 6,000 sq.m. of play space provision on-site. The applicant’s illustrative masterplan includes play space provision totaling 5,530 sq.m and a minimum level of 5,000 sq.m. of play space provision is set out in teh applicant’s Development Specification document. As such, mitigation will be required in the form of a financial contribution towards off-site play space provision, which should be discussed with the Council, taking into account the potential to enhance nearby play facilities and noting the conclusions of the Homebase play space strategy and S106, as this scheme also results in a deficit in terms of on-site provision. The outline play space strategy for the site is supported. This envisages play space provision being provided within the two main public spaces, with the majority of play space provision being accommodated within the ‘Meander’ public space to the west and the Water Gardens to the north, the Clearing piazza, as well as further provision within the communal courtyards and rooftop level communal amenity space. This is acceptable, subject to a more detail play space and landscape strategy being secured by condition.

Urban design

Design, layout, public realm and landscaping

43 London Plan Policies 7.1 to 7.5, together with Policies D1 to D3, D8 of the Mayor’s Intend to Publish London Plan and the Housing SPG (2016) apply to the design and layout of development and set out a range of urban design principles requiring the provision of a high quality public realm; convenient, welcoming and legible movement routes; emphasising the importance of designing out crime by, in particular, maximising the provision of active frontages and minimising inactive frontages and by optimising the permeability of sites.

44 The masterplan proposals for the site have been revised since the initial GLA pre-application meeting in September 2019, with a new architect team (JTP) now progressing the scheme following a review of the original HTA masterplan. The revised scheme proposes two internal public squares, as opposed to the linear east-west public park / route running through the site to the MOL to the east which was a defining feature of the previous masterplan. The more open civic square which was previously proposed on Grant Way has been redesigned to ensure a more sheltered and enclosed public space, which would be better framed by buildings and more animated by ground floor non-residential uses ('the Clearing'). A mix of hard and soft landscaping proposed, including mature trees to provide seasonal interest and amphitheatre seating. The layout proposed would open up views of the Gillett Tower. This overall approach is strongly supported.

45 The second public space to the west ('the Meander') would comprise a swale, aquatic planting and play space and would be well-integrated with the movement network and green infrastructure proposed throughout the site with a greenway linking this space to Syon Lane and through to the MOL to the north. This is supported. The relationship with the Water Gardens to the north has also been significantly improved, with the proposal to transform this linear greenway into an actual water body with a wetland / habitat area fronted by leisure and residential uses and with timber viewing platforms proposed jutting out into the water at ground floor level. This is a creative landscape-led approach which helps to address what could have become a dark, overshadowed space in the previous masterplan and makes the most of this potential opportunity. Public access along the existing pathway would also be retained, which is welcomed.

46 The proposed movement framework would allow essential vehicle access to be provided whilst ensuring vehicle movement is restricted and the two main public spaces and other key routes are prioritised for pedestrians and cyclists. This is strongly supported. The street typologies proposed would also ensure a strong landscape-led approach is followed throughout the main north-south boulevard, east-west connecting lanes and along Syon Lane and McFarlane Lane, which would feature generous tree planting and verges, which is supported.

47 Having reviewed the design code, GLA officers consider this to provide an appropriate range of design principles and requirements in relation to movement routes, building frontages and entrances, streets and public spaces, car parking, podium and roof terraces and plot corners and landmark features covered in appropriate detail and with clear rules provided at a development parcel scale to ensure the successful delivery of the overall framework masterplan and an attractive, permeable and legible environment. Turning spaces are shown in the east-west lanes should be designed and managed to ensure these spaces are integrated into the overall landscaping and public realm, with the potential for multiple functions, in order to avoid these areas being dominated by servicing/deliveries or car parking. This should be carefully considered.

48 Overall, the design and layout of the proposed scheme is supported and complies with the overarching design principles set out in the London Plan and Intend to Publish London Plan.

Residential quality

49 London Plan Policy 3.5, Policy D6 of the Mayor's Intend to Publish London Plan and the Housing SPG (2016) seek high quality new housing provision. Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing in Class C3 use, as set out in Policy D4 of the Mayor's Intend to Publish London Plan. Private amenity space should normally be provided to serve upper floor flats in the form of balconies, unless there are exceptional circumstances which demonstrate that site constraints mean that balconies cannot be provided. Where is the case, the required quantum of compensatory floorspace should be provided within the dwelling as mitigation. Given the outline nature of the proposal, GLA officers would expect to see these minimum housing standards included within the design code and secured via condition. Single aspect units should normally be avoided and only provided where these units would constitute a more appropriate design solution in terms of optimising the capacity of a particular site whilst ensuring good design. Potential issues associated with single aspect units in terms of passive ventilation, privacy, daylight, overheating and

noise should also be adequately addressed and single aspect units that are north facing, contain three or more bedrooms, or are exposed to significant adverse noise impacts should normally be avoided. The 2016 Housing SPG also sets out benchmark unit per core per floor ratios.

50 The illustrative masterplan achieves approximately 55% dual aspect units, with some through dual aspect units proposed within the centre of linear blocks, as well as staggered and recessed dual aspect units. This layout approach is welcomed and helps to reduce the number of north-facing single aspect units by creating pop-out projecting elevations to ensure units have multiple outlooks. These indicative plans appears to avoid any north-facing single aspect units which is welcomed. The single aspect units proposed would be predominantly east or west facing which is welcomed. Overall, based on the illustrative masterplan provided, GLA officers are satisfied that the provision of dual aspect units has been maximised, taking into account the layout and density proposed.

51 Base on the illustrative material which has been provided in the applicant's Design and Access Statement, the unit per core per floor ratio is generally between 5 and 9 units per core per floor, there are a number of blocks at 10, 11 units per core per floor, although this reduces at upper floors due to the staggered massing which proposed and some blocks are served by two cores. This could be acceptable in this particular instance, providing appropriate levels of management are provided and secured.

52 The design code and development specification requires a minimum separation distance of 17 metres between facing habitable rooms across streets and courtyards, with 18 metres and 20 metres required on key east-west lanes and the north-south boulevard. This is supported. All of the communal outdoor amenity areas at rooftop level and within the internal courtyards and public spaces have been assessed against the BRE guidelines for direct sunlight on 21 March equinox (which requires spaces to achieve 50% at this date). All bar two of the internal courtyards would meet this standard, which would achieve 40% compliance on this date. The three main public open spaces within the scheme all comply comfortably with the BRE guideline. This is acceptable given the density and massing of the scheme and does not raise any strategic planning concerns. The proposed residential units would be 40-metres from the Sky Campus SIL to the north and buffered by the Water Gardens, which is acceptable and does not raise any concerns relating to the Agent of Change Principle and the function and continued operation of the SIL.

53 As set out above, a range of housing typologies including two-storey duplex / maisonettes and terraced homes in defined locations. This is strongly supported as a way of fronting / wrapping podium car parking and maximising the number of ground floor properties which can be served by individual front doors.

Density and design review

54 London Plan Policy 3.4 seeks to optimise housing density, with Policies D1 to D4 of the Intend to Publish London Plan placing greater emphasis on a design-led approach to ensure development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure.

55 The density of the scheme should be clarified. A design review was encouraged at pre-application stage, given the likely density and building heights proposed. A design review has been undertaken as detailed in the applicant's Design and Access Statement. The scheme has also been subject to an iterative process of design scrutiny with planning and design officers at the GLA and Hounslow Council. As such, GLA officers consider that the scheme has been subject to sufficient levels of design scrutiny, in accordance with the above strategic planning policies.

56 Overall, GLA officers consider that the site is suitable for a well-designed high density scheme, taking into account the site's size and location within an opportunity area and noting the relatively unconstrained nature of the site to the centre and north of the site towards the Sky Campus and designated MOL. Notwithstanding this, as with the Homebase site, the success of any

high density residential scheme will, however, depend on the potential to significantly improve the existing walking, cycling and public transport connections and address highways severance issues in what is a relatively car dominated junction on the A4 Great West Road.

Height, massing and tall buildings

57 London Plan Policy 7.7 and Policy D9 of the Mayor's Intend to Publish London Plan state that tall buildings should be part of a plan-led and design-led approach, incorporating the highest standard of architecture and materials and should contribute to improving the legibility and permeability of an area, with active ground floor uses provided to ensure such buildings form an appropriate relationship with the surrounding public realm. Tall buildings should not have an unacceptably harmful impact on their surroundings in terms of their visual, functional, environmental and cumulative impacts, including wind, overshadowing, glare, strategic and local views and heritage assets.

58 A plan-led approach to accommodating tall buildings within this area of the Great West Road has been undertaken as part of the Council's draft Great West Corridor Local Plan Local Plan (2019) and supporting Masterplan (2019). This identifies the site as being potentially suitable to accommodate a tall 'focal building' between 40-50 metres AOD, adjacent to the Sky Campus, although this is subject to a full assessment of the proposals against design and heritage policy criteria and proposals achieving an exemplary design standard and subject to design review. GLA officers also note that Hounslow's adopted Local Plan Policy CC3 supports tall buildings along sections of the A4 Golden Mile subject to certain design and heritage criteria.

59 With heights ranging from 3 to 17-storeys and including a series of 10, 12, 14, 15, 16 and 17-storeys, the proposed scheme would be subject to the above strategic policies in relation to tall buildings. The height and massing of the scheme has been refined since the initial pre-application meeting in September 2019 with the heights reduced to 3, 4 and 5 to 6-storeys along Syon Lane and the massing stepped up towards the centre and northern boundary of the site in order to respond to the surrounding townscape and heritage context. The massing and layout proposed also steps down the height of linear middle elements of the blocks to maximise the potential for daylight and sunlight penetration within the scheme, as shown below. Overall, this is an appropriate and context sensitive approach to the massing of the scheme which is supported and appropriately optimises the development potential of the site, whilst also responding positively to the opportunities and constraints in the immediate and wider townscape and landscape context.

Figure 1 - illustrative massing



60 The overall impact of the proposals in terms of wind, microclimate, daylight, sunlight and overshadowing is considered to be broadly acceptable, noting the findings of the applicant's Environmental Statement and subject to the mitigation measures proposed being fully incorporated at detailed design stage. As set out under layout and residential quality, the layout and massing would ensure that generally acceptable levels of sunlight would be achieved within the public realm and main public open space, with the daylight levels achieved within residential units considered to be acceptable for a scheme of this size and density in this location. Whilst there would be some daylight and sunlight impacts caused by the scheme to surrounding properties to the north-west, the vast majority of the properties assessed would meet the BRE guidelines and the impact of the scheme is considered to be, on balance, acceptable given the aspiration for higher density development in this location and noting the requirement to optimise the development capacity of the site. The impact would not cause unacceptable harm in terms of residential amenity.

61 The applicant's TVIA considers the impact of the proposed development on the Metropolitan Open Land (MOL) to the north (View 4). This shows that the blocks would be highly noticeable from within the MOL, which would significantly change the wider setting and character of the MOL. The proposed stepped massing and refined and sharpened building edges of the proposals would create a visually interesting and strong urban backdrop to the open space. Whilst the application would impact the visual openness of the MOL by altering the wider context, GLA officers consider that the visual impact would be positive and that the proposed buildings could enhance the wider landscape and townscape character and context of the MOL, subject to high quality design being secured, in line with the illustrative material provided in the Design and Access Statement. The spatial openness would not be impacted, nor would the recreational value or use of the open space. As such, the visual impact on the MOL is acceptable.

Heritage impact

62 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, Section 66 of the act states that 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*". In line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, planning decisions must also give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by a proposed development.

63 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to 'substantial harm' or total loss of the significance of a designated heritage asset, consent should be refused, 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. In every case, great weight should be given to the conservation of heritage assets and any harm to the significance of a designated heritage asset should require clear and convincing justification.

64 London Plan Policy 7.8 and Policy HC1 of the Intend to Publish London Plan state that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Policy HC1 seeks to avoid harm where possible and encourages heritage impact to be considered early on in the design process.

65 The applicant has submitted a Heritage Statement and Townscape and Visual Impact Assessment (TVIA) as part of their planning application. The TVIA considers the visual impact of the proposed development on designated heritage assets and townscape and landscape views in the immediate and wider context, showing the existing baseline context, the proposed development, and a cumulative scenario (which includes the proposed redevelopment at the existing Tesco Extra site to the north). The TVIA has been undertaken at an appropriate time of year with representative views assessed in March when leaves on not on the majority of trees, thereby providing a worst case assessment and additional summer views are provided for Syon Park to illustrate the visibility of the development in July when trees are in full foliage.

66 The applicant's TVIA (View 1) demonstrates that the proposals would cause less than substantial harm to the Grade II listed Former Gillette Factory both in isolation and in the cumulative view showing the proposed Homebase scheme. This view shows the proposed blocks within the outline application sited behind the tower of the Grade II listed building and protruding above the existing three and four-storey roofline. The visual prominence of the tower itself would still be preserved as the key landmark feature in the view. However, the appreciation of the sharp rectilinear and horizontal form and proportions of the Grade II listed former factory building which can currently be viewed against a backdrop of clear sky would be reduced which would cause harm to its setting and significance. Additional harm would also be caused by the visual impact of the Homebase development in this view. Overall, GLA officers consider that the level of less than substantial harm caused would be medium, on the scale of less than substantial harm.

67 Taking into account the proposed and cumulative Views 7 and 10 of the applicant's TVIA, GLA officers consider that the proposals would cause less than substantial harm to the setting and significance of the Grade II* listed Registered Osterley Park. GLA officers consider that the harm caused would be at the lower end of the range of less than substantial harm, taking into account the scale of the visual impact and the screening provided by existing trees as well as noting the overall significance of the designated heritage landscape and the contribution made by its setting. The proposals would not harm the setting of the Grade I listed Osterley House.

68 Overall, taking into account the specific impact of the application on the Grade I listed Registered Syon Park and noting the potential cumulative impact with the proposed Homebase application, GLA officers consider that this application would cause less than substantial harm to the Grade I listed Registered Syon Park, as demonstrated by View 14 of the TVIA, albeit this application would be comparatively less impactful compared to the Homebase scheme given the visual prominence and visibility of the proposals. GLA officers consider the less than substantial harm caused to be medium on the range of less than substantial harm, taking into account the overall significance and heritage value of the Grade I listed Syon Park and noting the contribution made by the wider landscape setting of Syon Park to its overall significance.

69 The TVIA demonstrates that this application would not be visible within any of the views identified from within the Royal Botanic Kew Gardens World Heritage Site, Old Dear Park Conservation Area or in views assessed from Boston Manor Park close to the Grade I Listed Boston Manor House. As such, GLA officers consider that this application would not cause any harm to these heritage assets, including the World Heritage Site.

Conclusion - heritage

70 To conclude in relation to harm to heritage assets, GLA officers consider that the application would cause less than substantial harm to the Grade I listed Registered Syon Park, Grade I listed Syon House, Grade II listed Former Gillet Factory and the Grade II listed Syon Clinic. This harm could be outweighed by the public benefits proposed, including in particular the provision of 1,677 homes of which 35% would be affordable, as well as the proposed public open space, new pedestrian and cycle connections, improvements to the Water Gardens and the provision of a mobility hub and enhanced bus facilities, as well as other potential community and social infrastructure, subject to further details being provided at Stage 2 and the public benefits being

secured. Improvements to pedestrian and cycle connections across the A4 would also potential comprise a substantial public benefit should these be provided, fully agreed and secured.

Fire safety

71 Policy D12 of the Intend to Publish London Plan seeks to ensure that development proposals achieve the highest standards of fire safety and to ensure the safety of all building users and should be designed to incorporate appropriate passive and active fire safety measures, alarm systems, and provide suitable arrangements for emergency service access and means of escape. In line with Policy D11, all major development proposals should be supported by a fire statement, undertaken by a suitably qualified assessor, which should cover the range of issues set out in that policy. Given the outline nature of the proposed development, a fire statement has not been submitted, which is acceptable in this instance. The submission and approval of a fire safety, in line with Policy D12 will be required at reserved matters stage and a condition is recommended to secure this.

Inclusive access

72 London Plan Policy 7.2 and Policy D5 of the Mayor's Intend to Publish London Plan require that all new development achieves the highest standards of accessibility and inclusive design. All new self-contained homes should meet the Building Regulations M4(2) standard for 'accessible and adaptable dwellings', with at least 10% of homes designed to meet the M4(3) standard for 'wheelchair user dwellings', as set out in London Plan Policy 3.8 and Policy D7 of the Mayor's Intend to Publish London Plan. The latter should generally be distributed across tenures and unit sizes and floors to provide housing choice. Based on the applicant's accommodation schedule and Design and Access Statement and Landscape Strategy, the application complies with these requirements, subject to details being secured by condition.

Climate Change

73 The applicant's proposed energy strategy would ensure a 36% reduction in CO₂ emissions over and above baseline Building Regulations requirements on the residential (domestic) element of the scheme, of which, 12% would be achieved through energy efficiency measures. The non-residential (non-domestic) element would achieve a 35% reduction in CO₂ emissions over and above baseline Building Regulations, of which, 24% would be achieved through energy efficiency measures. This complies with the minimum on-site targets for CO₂ emissions and energy efficiency performance which are set out in the Intend to Publish London Plan and London Plan.

75 The applicant's energy strategy proposes to supply heat from a site wide energy centre, with heat supplied to all the residential units by a combination of air source heat pumps and gas boilers. No renewable energy technologies eg solar panels are proposed, which has not been sufficiently justified, given that these could be combined with green / brown roofs. This requires further justification. The applicant should also provide a further update regarding their investigation and discussions relating to the potential to connect to the Sky Campus heat network. If this is not possible, provision should be made to future proof the scheme to enable connection of the site to a wider district heat network. Given the outline nature of the scheme, a final energy strategy should be secured by condition, with further details required at reserved matters to verify key assumptions and performance standards and confirm the carbon offset payment required.

Flood Risk and sustainable urban drainage

75 The site is located within Flood Zone 1 and generally has a low to high risk of surface water flooding according to the Environment Agency flood risk maps, including along Syon Lane. The River Brent is 600 metres to the north. A range of sustainable urban greening (SuDs) measures are proposed as part of the applicant's illustrative masterplan and landscape strategy, including public open spaces with open water, rain gardens and swales, tree planting and permeable paving as well as green roofs, with the potential for additional attenuation below ground. This overall SuDs strategy is strongly supported and would accord with the London Plan drainage hierarchy. A full drainage

strategy should be secured by condition and details secured at reserved matters stage. This should ensure that the site-wide drainage strategy is designed to address the required surface run-off associated with a 100 year storm event, plus an allowance for climate change. Landscape details should also be secured. Subject to these conditions being included, the application is acceptable and would accord with the relevant policies in the London Plan and Intend to Publish London Plan.

Urban greening

76 As set out above, a range of urban greening measures are proposed within the landscape strategy, including lawns, planting and habitat areas around the proposed swale and the Water Gardens, together with tree planting and green podiums and roof terraces. This overall approach to urban greening is strongly supported. The potential for the scheme to accommodate urban greening and overall green cover should be maximized and a site wide Urban Greening Factor (UGF) assessment should be submitted and approved at reserved matters stage, in accordance with London Plan Policy 5.10 and Policy G5 of the Mayor's Intend to Public London Plan. This UGF assessment has not been undertaken at this stage, which is acceptable given the illustrative and outline nature of the proposed landscaping and planting.

Transport

Healthy streets

77 The proposed development will generate a significant increase in pedestrian and cycle trips to / from the site and the local area. The redevelopment of the site will see the creation of a new network of streets, which will significantly improve permeability and connectivity through the site for both pedestrians and cyclist. It will provide significant public realm improvements, which would result in an attractive pedestrian environment for future site residents and visitor and will be a significant improvement to the existing car dominated situation.

78 The Transport Assessment (TA) states that a 3-metre wide shared footway/cycleway along the site frontage would be delivered as part of the Bolder Academy development, would be re-provided as part of the Tesco Osterley development. Hounslow Council have aspirations that a further shared cycleway is provided within the redline boundary of the Tesco Osterley site and TfL support this. A Pedestrian Comfort Level (PCL) assessment is required to ensure that Syon Lane between the Tesco Osterley site and the rail station can accommodate the existing and proposed pedestrian movements.

79 Whilst two of the highway options considered in the highways impact section below would improve pedestrian connections and reduce severance across the A4, the TA fails to detail improvements to pedestrian and cycle connections between the Tesco Osterley site and Gillette Corner which will be delivered by the applicant. Any changes to the public highway associated with the proposed development will require the developer to enter into a section 278 Agreement under the Highways Act 1980, with TfL and/or Hounslow council.

Car parking

80 It is proposed to provide 400 residential car parking spaces on site (including car club spaces), which equates to a car parking ratio of 0.23 spaces per unit. The proposed non-residential uses are to be car free. The car parking provision proposed accords with the Intend to Publish London Plan maximum standards for the Outer London Opportunity Area. Residential disabled persons parking and active and passive charging facilities would be provided in accordance with the Intend to Publish London Plan. These should be secured by condition. The full Car Parking Management Plan (CPMP) should be secured by condition. Residents will be exempt from applying for car parking permits in any existing or future CPZ which should be secured through an appropriate legal mechanism. Three year's free car club membership for all new residents should also be secured.

Cycle parking

81 The TA states that cycle parking for all land uses would be provided in accordance with the ItP London Plan's minimum cycle parking standards. This should be secured by condition. All cycle parking is required to be designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS).

Trip generation and modal split

82 Whilst TfL are generally satisfied that the overall trip generation assessment is broadly robust, the TA does include some sweeping assumptions in the retail trip generation summary which should be quantified.

Highways impact and mitigation

83 The redevelopment of the Tesco Osterley site is predicted to generate 142 two-way vehicle trips in the AM peak hour and 138 during the PM peak hour (excluding service vehicle trips). This results in a net reduction of vehicle trips of - 244 trips in the AM peak hour and - 570 in the PM peak hour. However, when the two sites are combined there will be an overall net increase of 141 vehicle trips in the AM peak hour and 70 in the PM peak hour.

84 In order to test the impacts of the vehicle trips generated by both the Homebase and the Tesco Osterley sites, detailed junction modelling using VISSIM microsimulation modelling software has been undertaken. The following three Options have been initially identified to mitigate the impacts of development traffic and to provide pedestrian and cycle improvements in line with Healthy Street approach:

- Option 1 includes a new traffic signal control junction for the Homebase site and the addition of a second right turning lane on the A4 for traffic turning into Syon Lane (towards the new Homebase site access) from the west. This option also includes the relocation of the existing bus stop layby on the A4 Great West Road (Westbound) further east to extend the cycle lane. Option 1 effectively facilitates vehicle access to the development site and provides only limited improvements for active travel, and for this reason is unlikely to be supported.
- Option 2 includes the same measures as Option 1 but includes a new at grade pedestrian crossing on the A4, to the east of Syon Lane, to replace the existing pedestrian underpass. It retains a double right turn from the A4 into Syon Lane North. It also creates a double right turn lane from the A4 to Syon Lane south which is achieved with minor carriageway widening on the south-western side of the Gillette Corner junction.
- Option 3 includes the same measures as Options 1 and 2 but and includes new signalised pedestrian crossings on Syon Lane, both north and south of the A4.

85 All three Options have progressed through the TfL VISSIM Modelling Audit Process (VMAP). However, some further work is required in terms of reporting - so that the true impact of each option is clearly understood, and the most suitable mitigation for the combined developments can be determined.

Bus infrastructure

86 The redevelopment of the site will require the relocation of the existing bus terminus to a new location on Grant Way. This facility will include a new bus stop, bus stand; and a new bus turn around facility. Whilst the principle of this has been agreed, the detailed design will still need to be agreed with TfL. There is also a requirement for a bus driver facility to be provided. The requirement for the detailed design of the bus facility and bus driver facility should be secured in the s106 agreement. Any costs associated with relocating the bus terminus and new bus infrastructure will need to be fully funded by the applicant.

Bus capacity and mitigation

87 The redevelopment of the Tesco Osterley site is predicted to generate 386 two-way bus trips in the AM peak hour and 297 two-way trips in the PM peak hour. TfL have accessed the combined uplift in demand based on pre-COVID capacity and conclude that additional buses would be required to accommodate the predicted level of demand generated by both sites. Financial contributions are required for 5 years to allow for passenger demand to build up. The total contribution requested would therefore be £340,000 x 5 years which equates to £1,700,000 for both development sites.

Rail and London Underground infrastructure

88 Syon Lane Station and the trains which serve it are operated by South Western Railway (SWT). It will be for Network Rail and SWT to comment on the potential impact of the development on Syon Lane Station and the train services which operate through it. However, it is noted that Syon Lane Station is identified within the GWC Strategic Transport Study, as having existing capacity constraints during peak times. Further analysis is required to assess the impact of predicted London Underground trips on station and line capacity.

Delivery and servicing and Travel Plan

89 A Framework Delivery and Servicing Plan (DSP) has been provided. Further work is required including an uplift in the predicted number of service vehicle trips which have been significantly underestimated. Travel Plans should be secured, monitored, reviewed, and enforced through the s106.

Local planning authority's position

90 Hounslow Council Planning Officers are reviewing the scheme and a Planning Committee date has not been confirmed.

Legal considerations

91 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 take over the determination of 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

92 There are no financial considerations at this stage.

Conclusion

93 Intend to Publish London Plan policies on retail and town centre uses; opportunity areas; housing supply; housing and affordable housing; play space; urban design; residential quality; density; tall buildings; heritage; inclusive design; energy; sustainable urban drainage; urban greening; and transport are relevant to this application.

- **Principle of development:** The principle of the comprehensive residential-led mixed use redevelopment of this out of town retail park site within an opportunity area accords with the

land use principles set out in the London Plan and Intend to Publish London Plan and is strongly supported.

- **Housing and affordable housing:** 35% affordable housing by habitable room, comprising 66% intermediate housing and 34% London Affordable Rent. The cumulative affordable housing offer across this application and the linked Homebase application would ensure 35% affordable housing provision with a 50:50 tenure mix (by habitable room). The proposed tenure mix across both sites has been agreed with Council and GLA officers and complies with the Intend to Publish London Plan and the sites would be formally linked via S106 agreement. As such, the application is considered eligible for the Fast Track Route. Affordability levels for the intermediate and London Affordable Rent units should be secured and should meet the requirements and criteria set out in the Intend to Publish London Plan and the Affordable Housing and Viability SPG. The off-site play space provision should be detailed and agreed and secured by S106 agreement. An early stage viability review mechanism and a provision within the S106 agreement to ensure that the applicant fully explores the potential for grant funding to increase the level of affordable housing beyond the baseline level agreed. Phasing of affordable housing should be confirmed, as should the affordability levels.
- **Urban design and heritage:** The density, design and layout, residential quality and proposed height and massing is supported, subject to the design code and landscape strategy being appropriately secured. The application would cause less than substantial harm to the setting and significance of the Grade I listed Registered Syon Park, The Grade II* listed Registered Osterley Park and the Grade II listed Former Gillette Factory. The overall cumulative harm caused to these designated heritage assets could be outweighed by the proposed public benefits, subject to these being secured and detailed at Stage 2.
- **Climate change:** The energy, drainage and urban greening strategies are generally supported subject to further information being provided on the energy strategy. Further information and justification is required regarding the absence of solar PV panels on the scheme. An update should also be provided prior to Stage 2 regarding the potential to connect to the Sky Campus heat network.
- **Transport:** Further work is required on the modelling of highway options to ensure that a preferred option can be identified and agreed. A bus contribution of £1,700,000 is required for both development sites to mitigate the impact on bus capacity. Further detail on the public realm improvements and site access improvements are required to ensure that these are safe and meet the requirements of Healthy Streets. A Pedestrian Comfort Level assessment is required on Syon Lane. The pedestrian and cycle connections between the two development sites should be improved. Car parking is acceptable and complies with the maximum standard in the Intend to Publish London Plan. Cycle parking would also meet the quantitative standard required in the Intend to Publish London Plan. Compliance with the London Cycling Design Standards (LCDS) should be secured. Further details are required on the Delivery and Servicing Plan.

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