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## **PLANNING STATEMENT**

### **PROPOSED COMMERCIAL DEVELOPMENT AT ADINI, 891, GREAT WEST ROAD, ISLEWORTH TW7 5PD**

Date: November 2017

Ref: 12510

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## APPENDICES

### APPENDIX 1: COUNCIL'S PRE-APPLICATION ADVICE LETTER OF 12 APRIL 2017

<b>Revision</b>	<b>Description</b>	<b>Originated</b>	<b>Checked</b>	<b>Reviewed</b>	<b>Authorised</b>	<b>Date</b>
	First Draft	AJC	JB	JB	JB	20/11/17
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<b>DWD Job Number: 12510</b>						

## 1.0 INTRODUCTION

- 1.1 This Planning Statement ('Statement') accompanies an application for full planning permission ('Application') which is submitted to the London Borough of Hounslow ('the Council') on behalf of Songkarn Ltd ('the applicant') for the redevelopment of land at 891 Great West Road for commercial purposes.
- 1.2 Songkarn Ltd, which trades as Adini is a wholesale and online clothing and fashion retail company which has operated from its premises at 891 Great West Road since 1981. It is a growing business that currently employs 17 staff. The existing premises are now inadequate for the company's needs and in order to sustain and develop its business operations in Isleworth, the applicant intends to replace its existing warehouse/offices with a larger, purpose-built, modern building to increase clothing storage capacity and meet the growing and evolving needs of the business.
- 1.3 As such this Application proposes the *"Demolition of existing buildings and erection of a four-storey (plus basement) mixed-use building for online retail fulfilment and wholesale purposes including storage and distribution (Class B8), offices (Class B1(a)) and ancillary retail, gallery/display and photographic studio uses, provision of car and cycle parking, hard and soft landscaping and associated development"*. The building is to be occupied solely by Adini and is designed to meet the current and future needs of the company and is envisaged to more than double the number of jobs on-site to at least 35.
- 1.4 The application site comprises the front part of the Adini site; the rear portion referred to as 'Land North of Northumberland Avenue' is the subject of a separate but related planning application for a proposed residential development in order to fund the commercial development.
- 1.5 This application follows pre-application engagement with the Council since November 2016 which has included the submission of an initial scheme and various iterations, a pre-application meeting, receipt of two written pieces of advice (most recently the Council's letter dated 12 April 2017 (see Appendix 1) and subsequent verbal advice. The proposals have been developed in accordance with the comments received and the scheme now proposed under this application is understood to be one which officers have indicated they will support.
- 1.6 This Statement outlines the proposed development and explains how it complies with the relevant policies within the Development Plan and other material considerations including national planning policy.

- 1.7 A Design and Access Statement prepared by Satish Jassal Architects details the urban design concept and design evolution of the Proposed Development.
- 1.8 This Statement should be read on conjunction with the submitted covering letter, application form, drawings and plans and other supporting documents forming part of the application submission which comprises:
- Application drawings as listed in the covering letter;
  - Design and Access Statement prepared by Satish Jassal Architects;
  - Heritage Statement – Art Deco Building and Warehousing prepared by Caroe Architecture;
  - Heritage Statement – Historic Boundary Walls prepared by Caroe Architecture;
  - Condition Survey – Art Deco Building and Warehousing prepared by Caroe Architecture;
  - Condition Survey – Historic Boundary Walls prepared by Caroe Architecture;
  - Energy Statement prepared by AJ Energy Consultants Limited;
  - Sustainability Statement prepared by AJ Energy Consultants Limited;
  - Daylight and Sunlight Report prepared by Waterslade;
  - Drainage Assessment Form prepared by EAS;
  - Transport Statement and Travel Plan prepared by EAS;
  - Air Quality Assessment prepared by WYG; and
  - Phase 1 Environmental Assessment prepared by SLR.
- 1.9 Section 2 of this Statement sets out a description of the site and its context. Section 3 details the recent planning history and pre-application discussions on these proposals. The proposed development is described in Section 4. The relevant national planning policies, the Development Plan and other material considerations are set out in Section 5 and a detailed planning assessment of the proposed development is provided in Section 6. The overall conclusions are reached in Section 7 are that the proposed development is in accordance with the Development Plan and all other material considerations, and provide an expanded and improved commercial premises for the applicant, a growing local business.

## 2.0 SITE AND SURROUNDINGS

- 2.1 The application site is outlined in red on the 'existing location plan' (ref. 133-030-EX-LOC) and is a broadly rectangular parcel of land measuring approximately 1,358 square metres ('sqm') located adjacent and to the south of 891 Great West Road. It currently comprises the majority of the existing Adini facility (save for a small section of the south-eastern end of the warehouse) and the front curtilage of the property which provides car parking.
- 2.2 The site is accessed by the Great West Road (the A4) which is an arterial road running west to east between Heathrow Airport and Gunnersbury.
- 2.3 The Adini building currently provides 892sqm (GIA) of floorspace with warehouse space to the rear, providing a total of 708sqm (GIA) of floorspace (of which 99sqm is outside of this application site, but within the residential development site) and 184sqm of office/light industrial floorspace.
- 2.4 Land to the south east of the site is the remaining portion of the Adini site, subject of the parallel application for residential development, and currently provides 16 car parking spaces, a small garage building providing two further car parking spaces, a small part of the existing Adini warehouse building and a patch of grass.
- 2.5 Land to the north-east of the application site is the 'Gillette South' site which previously contained a petrol filling station but is now a cleared site and up until recently has been used for the parking of vehicles. The Gillette South site has recently been the subject of a planning application which proposed a large residential-led mixed-use scheme of up to 11 storeys in height which was refused in August 2017 (see paragraphs 3.2 and 3.3 below for further details). Further to the east are a number of large floor plate retail stores including Argos and Homebase, alongside other commercial uses.
- 2.6 Directly to the west of the application site are the rear gardens of residential properties on Warkworth Gardens, however these sites are separated by an existing brick wall that measures approximately 2.5m in height and provides a good degree of screening and separation.
- 2.7 The site is fronted to the north by Great West Road, with a Shell petrol filling station and residential dwellings on the opposite side of the road.
- 2.8 The general character of the surrounding area is mixed with the site forming part of a transition between the predominantly residential area to the south and west and the more commercial character to the north and east of the application site. The residential area is characterised by rows of semi-detached and short-terraced houses whereas the commercial area on the opposite

side of Great West Road and Syon Lane crossroads is dominated by large office, commercial and retail warehouse buildings.

- 2.9 The site is not located within a Conservation Area and does not contain any statutory or locally listed buildings. The Grade II listed Gillette building is located some 115m to the north east however the application site is not considered to be within its setting.
- 2.10 Whilst the site has a public transport accessibility ('PTAL') level of 2 it is some 160 metres from Syon Lane Overground Station which provides convenient links to Clapham Junction, Vauxhall and Waterloo Station. Furthermore the site is located nearby to the H91 bus route that links the site to Hammersmith and Hounslow West among other locations. There are also bus services (235, 237, 267 and H28) located approximately 640m to the south of the site on London Road.
- 2.11 The Design and Access Statement (DAS) submitted with the application provides further analysis of the existing site context.

### 3.0 PLANNING HISTORY AND PRE-APPLICATION ADVICE

#### Planning History

##### Application Site

- 3.1 A summary of the planning history for the site that is available on the Council's online records is provided below:

**Table 3.1: Planning History**

Reference	Location	Description	Decision	Date
00505/891/P3	Adini, 891 Great West Road, London, TW8 9DN	Erection of a first floor extension to create additional office/workshop space and the creation of ten additional car parking spaces to front of site	Approved	21/04/2005
00505/891/P2	Adini, 891 Great West Road, London, TW8 9DN	Demolish existing buildings and erect a new building comprising 3 floors of offices/warehouse over a semi-basement car park	Approved	N/A

##### Surrounding Area

- 3.2 A planning application (reference P/2017/0053) was submitted in January 2017 at Land South of Gillette Corner (to the east of the application site) for *“Redevelopment of the site to provide a mixed-use development with heights between 4 and 11 storeys and including 3 basement levels, comprising up to 102 residential units (Use Class C3), office (B1) and self-storage uses (B8), car and bicycle parking, hard and soft landscaping with all necessary ancillary and enabling works”*.
- 3.3 Planning permission was refused in August 2017 for the following reasons:
- *“The proposal, by reason of its position, size, scale, mass, design and external appearance, would be an intrusive development, out of scale and character with the prevailing pattern of development in the locality, would cause harm to the character of the wider area, as well as having a serious and adverse effect on the amenities enjoyed by occupants of neighbouring properties. It would be contrary to London Plan Policies 7.4 (Local Character), 7.6 (Architecture), 7.7 (Location of tall buildings and large buildings) and Local Plan Policies CC1 (Context and Character), CC2 (Urban Design and Architecture), CC3 (Tall buildings) and the aims and objectives of the National Planning Policy Framework”*.

- *“The proposal, by virtue of its location, scale and design, would cause harm to the setting of nearby designated heritage assets. It has not been demonstrated that the substantial harm would be necessary to achieve substantial public benefits that outweigh the harm caused. The development is contrary to London Plan Policies 7.8 (Heritage assets and archaeology), 7.7 (Location and design of tall and large buildings) and 7.4 (Local character) and Local Plan policies CC4 (Heritage), CC3 (Tall buildings) and the aims and objectives of the National Planning Policy Framework”.*
- *“The proposal is not sustainable development. Its characteristics render it unviable, even without any affordable housing provision, and so the maximum reasonable amount of affordable housing which could potentially be delivered on the site will not be realised, and thus the current scheme is not in accordance with London Plan Policy 3.11 and Local Plan Policy SC2 and the objectives of the National Planning Policy Framework”.*

### **Pre-application Advice**

- 3.4 The applicant has held two formal pre-application meetings with the Council since November 2016 and undertaken subsequent informal discussions with the case officer. The proposals have developed in accordance with the feedback received and the scheme now proposed under this application is one which it is understood officers will support, as summarised below.

#### November 2016 Submission

- 3.5 A detailed pre-application submission was made in November 2016 which proposed the first iteration of redevelopment proposals for the wider site. The proposals included the demolition of the Adini building and erection of a four storey commercial building comprising warehouse space and offices fronting Great West Road in addition to the erection of 12 new residential apartments in two blocks fronting Northumberland Road to the south of the site. The boundary wall to the south of the site was proposed to be demolished to allow vehicular access from Northumberland Road.
- 3.6 The Council’s written feedback dated 30 November 2016 recommended that a conservation architect should be engaged to advise on the potential heritage value of the Adini ‘Art Deco’ building and the historic wall as both were proposed to be removed. Accordingly, Caroe Architecture were appointed to produce a Heritage Statement and Condition Survey for both the Adini building and the historic boundary wall.

March 2017 Submission

- 3.7 The second pre-application submission was made on 17 March 2017 and included a range of commercial and residential redevelopment options for the site, providing the Council with an opportunity to identify its preferred option. The Council's pre-application advice letter of 12 April is included at Appendix 1. Following the comments received, a further revised scheme was submitted in response to the comments and verbal advice was given informally by the case officer on 20 July 2017.
- 3.8 Heritage Statements and Conditions Surveys for both the Adini building and the historic boundary wall were provided to the Council. This information demonstrated that the Adini building is in a considerable state of disrepair and was much altered in the past with some of the later alterations previously described detracting from its overall significance.
- 3.9 The Council acknowledged the findings of the Heritage Statements and accepted that the existing Adini building can be demolished as part of the redevelopment proposals so long as the historic boundary wall is retained. The Council also advised that the commercial element should be a maximum of 2 storeys to the front of the site, with up to four storeys in height towards the rear. The subsequent verbal advice indicated that the commercial building should also step in away from the residential properties to the south-west and the proposed residential development to the south-east.
- 3.10 The applicant has reviewed and considered all advice from the Council in both pre-application responses and subsequent correspondence which has helped shape the development now proposed under this current application.

## 4.0 THE PROPOSED DEVELOPMENT

- 4.1 This Section of the Statement provides an overview of the form and nature of the proposed development. Further information relating to the design of the proposed development is contained within the DAS as well as the other submitted documents and drawing listed in paragraph 1.9 of this Statement.
- 4.2 The formal description of the proposed development for the purposes of the Application is the *“Demolition of existing buildings and erection of a four-storey (plus basement) mixed-use building for online retail fulfilment and wholesale purposes including storage and distribution (Class B8), offices (Class B1(a)) and ancillary retail, gallery/display and photographic studio uses, provision of car and cycle parking, hard and soft landscaping and associated development”*.
- 4.3 The proposed building will provide 2,614sqm (GIA) of floorspace across its four floors and basement. The primary functions are storage and distribution (class B8) and associated offices (class B1(a)) totalling 1,661.5sqm and 952.5sqm respectively. This includes floorspace for ancillary uses including a small retail area, gallery/display area and a photographic studio.
- 4.4 The ground floor will provide approximately 90sqm of dedicated warehouse/storage adjacent to the loading/unloading area. A reception area with a gallery/display area totalling approximately 108sqm and a retail area of approximately 87sqm are provided at ground floor providing an active frontage to Great West Road. The basement and first floor provide further warehouse/storage space of approximately 714sqm and 712sqm respectively, connected via a dedicated goods lift.
- 4.5 The second floor is for a general office space and the third floor is a graphic design studio and ancillary photographic studio all for use in association with the online retail fulfilment and wholesale operations of the business.
- 4.6 An area schedule is provided in the Design and Access Statement; however the primary uses for planning purposes are as summarised below.

**Table 4.1: Floorspace Schedule**

Use	Use Class	Floorspace (sqm in GIA)
Warehouse/storage (includes 50% of the reception and ancillary gallery/display area and 50% of the ancillary retail area)	Class B8	1,661.5
Office (includes 50% of the reception and ancillary	Class B1(a)	952.5

gallery/display area, 50% of the ancillary retail area and 100% of the graphic design and photographic studio)		
Total	N/A	2,614

- 4.7 The design of the building features tapering anodized aluminium piers, infilled with glazing and brushed aluminium panels. The third and fourth storeys of the building steps on the three sides facing Great West Road, the residential properties to the south-west and the remainder of the Adini site to the south-east so that the building responds to its surroundings and context.
- 4.8 An undercroft car park is provided to the rear of the building at ground level and further spaces externally beyond that, totalling 17 spaces. The layout allows sufficient turning space for vehicles to access and egress the site in a forward gear. The proposal also includes 10 cycle parking bays for staff and 6 visitor cycle parking bays, as well as dedicated space for the storage of refuse.
- 4.9 As explained in the introduction of this Statement, a separate but related planning application has been submitted by the applicant for the redevelopment of the remaining portion of the Adni site (referred to as Land North of Northumberland Avenue) for the erection of a four-storey building to provide 16 self-contained flats, provision of private and shared amenity space, cycle parking, hard and soft landscaping and associated development.
- 4.10 Separate planning applications have been submitted to facilitate ease of sale of the land for the residential development which is to fund the commercial development. Whilst the commercial and residential developments have been designed to be capable of being delivered independently of each other, the scenario of one happening without the other is unlikely. Nevertheless, for robustness the technical assessments accompanying this application consider both scenarios.

## 5.0 THE DEVELOPMENT PLAN AND MATERIAL CONSIDERATIONS

5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory Development Plan for the application site comprises the following:

- The London Plan (March 2016)
- The London Borough of Hounslow Local Plan (September 2015)

### The London Plan

5.2 The following London Plan policies are considered relevant to the consideration of the proposed development:

- 2.16 – Potential Strategic Outer London Development Centre
- 4.1 – Developing London’s Economy
- 5.1 – Climate Change Mitigation
- 5.2 – Minimising Carbon Dioxide Emissions
- 5.3 – Sustainable Design and Construction
- 5.7 – Renewable Energy
- 5.13 – Sustainable Drainage
- 6.9 – Cycling
- 6.10 – Walking
- 6.13 – Parking
- 7.4 – Local Character
- 7.6 – Architecture
- 8.3 – Community Infrastructure Levy

### Hounslow Local Plan

5.3 The following Hounslow Local Plan (‘HLP’) policies are considered relevant to the consideration of the proposed development:

- SV1 – Great West Corridor

- ED1 – Promoting Employment Growth and Development
- ED2 – Maintaining the Borough’s Employment Land Supply
- CC1 – Context and Character
- CC2 – Urban Design and Architecture
- EQ1 – Energy and Carbon Reduction
- EQ2 – Sustainable Design and Construction
- EQ3 – Flood Risk and Surface Water Management
- EC2 – Developing a Sustainable Local Transport Network

### **Other Material Considerations**

#### National Planning Policy Framework

- 5.4 The National Planning Policy Framework (‘NPPF’) was published in March 2012 and introduced the presumption that where sustainable development proposals accord with up-to-date development plan policies, they should be approved without delay (paragraph 14).
- 5.5 One of the 12 core planning principles of the NPPF is to *“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs”* (paragraph 17).
- 5.6 Paragraph 18 of the NPPF reiterates the Government’s commitment to *“securing economic growth in order to create jobs and prosperity”* and paragraph 19 identifies the *“Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support an economy fit for the 21<sup>st</sup> Century.*
- 5.7 Paragraph 58 of the NPPF encourages local planning authorities to ensure that developments *“optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses”*.
- 5.8 Paragraph 111 states that planning decisions should *“encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”*.

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[Mayor of London Supplementary Planning Guidance](#)

5.9 The Mayor's Supplementary Planning Guidance (SPG) documents provide further detail on particular policies in the London Plan, the following of which are relevant to the Proposed Development:

- Sustainable Design and Construction

[London Borough of Hounslow Urban Context and Character Study \(2014\)](#)

5.10 The Study identifies that the application site is located on the western edge of Character Reach D of the Great West Road area. The Study states that the use of this area is exclusively non-residential and almost entirely commercial. The Study describes the western part of the Character Reach area as a strip of business parks and large footprint commercial and retail boxes, some of which are fronted by remaining Art Deco office buildings.

5.11 Further west the big box commercial landscape abruptly gives way to an extensive interwar ribbon development of semi-detached and short-terraced two storey housing alongside and to the north and south of the Great West Road.

[Emerging Great West Corridor Local Plan](#)

5.12 The Council is currently consulting on the Preferred Options Great West Corridor Local Plan between October to December 2017. This emerging plan relates to HLP Policy SV1 which set out the requirement for a partial Local Plan review to identify the extent of the Great West Corridor and plan for the location and quantum of employment and residential development above existing Local Plan levels through site allocations.

5.13 The boundary of the Great West Corridor shown in the current consultation is located approximately 75 metres to the east of the application site. When adopted the Great West Corridor will be a focus for significant employment development and further reinforces the character of the local area.

## 6.0 PLANNING ASSESSMENT

### Principle of Proposed Commercial Development

- 6.1 The site is currently occupied by Adini for a warehouse and office facility, and Adini has been on the site since 1981. Adini is a growing business that currently employs 17 staff and the existing premises is now inadequate for the company's needs. In order to sustain and develop its existing business operations in Isleworth, Adini intends to replace its existing warehouse/offices with a larger, purpose-built replacement facility to increase its clothing storage capacity and meet the growing and evolving needs of the business. This is envisaged to increase the number of employees on the site to at least 35. Support for sustainable economic development is supported at all tiers of the planning policy framework.
- 6.2 The NPPF seeks to proactively drive and support sustainable economic development to deliver commercial development in order to create jobs and prosperity. The NPPF also outlines the Government's expectation that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth.
- 6.3 London Plan Policy 4.1 promotes the continued development of a strong, sustainable and increasingly diverse economy in London, and Policy 4.2 supports the management and mixed use development of office provision to improve London's competitiveness.
- 6.4 The application site does not have a specific policy allocation within Hounslow Local Plan, however Policy ED1, which seeks to secure business opportunities stimulated by the borough's proximity to Heathrow airport and central London directs *"new industrial/warehousing and related development to the borough's Strategic Industrial Sites, Locally Significant Industrial Sites and other existing industrial sites"* (HLP Policy ED1(c)).
- 6.5 The proposed development seeks to re-provide and expand the existing warehouse and associated office facilities currently on the application site in order to meet the current and future needs of this local business, envisaged to increase more than double the number of jobs on-site. This meets the specific locational requirement of part (c) of HLP Policy ED1, the general economic development thrust of policy ED1 and national and London Plan policies. Furthermore the Council has confirmed at the pre-application stage that the principle of development at this site is acceptable.

## Heritage and Design

- 6.6 During pre-application discussions the Council identified that the Adini building and boundary wall on the site were of heritage value and that the fact the Council's out of date local list of buildings of townscape merit does not designate the building, site or its boundary treatment should be disregarded.
- 6.7 The Council, in its first pre-application advice to the applicant in November 2016, identified an in principle objection to the demolition of the existing Art Deco building as they felt it was of good quality and architectural significance and makes a positive contribution to the local environs. In addition, the response identified that the historic brick wall to the rear of the site was of considerable historic and architectural importance and was worthy of retention and repair.
- 6.8 The Applicant was invited to carry out research on both the Art Deco building and historic wall to ascertain their heritage value and submit these with any application for development on the site. The Applicant has since instructed Caroe Architecture to prepare Heritage Statements and Condition Surveys of the existing Adini facility and the boundary wall of the site in order to inform the Proposed Development. These reports were submitted with the pre-application advice request of March 2017.

### Art Deco Building

- 6.9 The Heritage Statement for the existing Art Deco building identifies that the building is neither nationally nor locally designated and is currently in a considerable state of disrepair. The building has been much altered in the past with some of the later alterations detracting from its overall significance.
- 6.10 The building has been extensively patched up over the years, and despite repairs to the roof, the building has suffered from water ingress due to defective roof coverings and penetrative damp from the walls. The roof is also now failing. The report confirms that if not addressed the building will continue to slowly deteriorate and will in itself become a detracting feature in the townscape.
- 6.11 Subsequent to the submission of the Heritage Statement, the Council issued their pre-application advice in March 2017 that identified the Council was comfortable with the demolition of the existing Adini building as part of the proposed development.

### Historic Boundary Wall

- 6.12 The Heritage Statement for the boundary wall identifies that the wall is neither nationally nor locally designated. The Report identifies that the wall was originally built in 1722 as a garden wall to Sion Hill House and was later acquired by the Duke of Northumberland in the 18<sup>th</sup> Century and

was blocked in with stock brick and stone dressings. Sion Hill House or its wider estate no longer exists and has been replaced by urban development.

6.13 The Statement concludes that the main features of interest of the wall are the neo-classical triumphal arch and gateway at the southern end of the wall running along Northumberland Avenue. This part of the boundary wall is not affected by the proposed development subject of this Application and furthermore the part of the boundary wall that runs along the south western boundary is to be retained and unaffected by the proposed development.

6.14 The proposed development therefore does not give rise to any heritage harm. Furthermore, whilst the wall is not formally designated as a heritage asset it is recognised to be of some historical and architectural value and the assessment concludes that the proposed development will enhance the public experience of it and its setting. As such the proposed development meets the objectives of the NPPF and HLP Policy CC4 which seeks to conserve and enhance heritage assets and Policy CC2 which seeks to the integration of existing features into developments.

#### Design of the proposed building

6.15 The Design and Access Statement submitted with the application provides an overview of the design rational and its evolution, demonstrating compliance with development plan policies on design most notably London Plan policies 7.4 and 7.6 and HLP policies CC1 and CC2.

#### **Impact on Neighbouring Residential Amenity**

6.16 HLP Policy CC2 seeks high quality urban design as part of development proposals, which should among other factors *“minimise overbearingness and overshadowing, and ensure sufficient sunlight and daylight to proposed and adjoining/adjacent dwellings”*.

6.17 The design, scale and massing of the proposed building has been designed so that it preserves the amenity of the occupiers of the adjacent residential dwellings in Warkworth Gardens as well as the potential future occupiers of the proposed residential development on the land to the north of Northumberland avenue site.

6.18 The first floor windows on the south-western elevation of the proposed building are to be obscure fixed glazing to prevent overlooking and the third and fourth floors are stepped in which increases the distance between facing windows.

6.19 The stepping in of the building at the upper levels follows the Council’s pre-application advice and together with the proposed basement ensures that sites development potential is maximised

whilst ensuring the building is not overbearing or cause unacceptable loss of sunlight or daylight to the residential properties in Warkworth Gardens.

- 6.20 The Daylight & Sunlight Report submitted considers the impact of the proposed development (including the cumulative effect of the proposed residential development on land north of Northumberland Avenue to south-east) on the adjacent residential properties on Warkworth Gardens. The assessment concludes that *“The impact of the proposed development largely complies with the default BRE criteria. Whilst there are localised impacts, in each case these are reasonable and compare favourably with appropriate urban daylight levels”*. As such the proposed development is in accordance with HLP Policy CC2.

### **Energy and Sustainability**

- 6.21 London Plan Policy 5.2 seeks to minimise carbon dioxide emissions by applying the energy hierarchy to achieve specific carbon dioxide reduction targets; major development proposals are required to be accompanied by energy assessments to demonstrate this. Policy 5.7 encourages the use of on-site renewable energy generation within the framework of the energy hierarchy.
- 6.22 HLP Policy EQ1 cross refers to the carbon dioxide reduction targets in the London Plan and requires major developments to explore opportunities for connecting to decentralised heating, cooling or power networks and use of combined heat and power (CHP) systems.
- 6.23 The Energy Statement which accompanies the application sets out measures for improved insulation and air tightness standards compared against the compliance requirements of Part L 2013 of the Building regulations, as well as energy efficient heating, ventilation and lighting services, in excess of the Part L1 2013 requirements, applying the London Renewables Toolkit methodology.
- 6.24 As required by London Plan Policy 5.6 and HLP Policy EQ1, the Energy Statement also assesses the feasibility of connecting to district heating schemes and use of CHP but concludes that these are not feasible. It does, however confirm that air to heat pumps are feasible and are proposed to provide space heating and comfort cooling, with photovoltaic panels at roof level to generate electricity for the site. It has been estimated that the proposed heat pump and photovoltaic systems would reduce the annual carbon dioxide emissions of the site by 30,242 kgCO<sup>2</sup>, which equates to a reduction of 32.6% against the Target Emission Rate (2013) in accordance with London Plan Policy 5.2. The incorporation of the energy efficiency measures and photovoltaic panels equates to a reduction of 41.8% against the TER 2013. On this basis the proposed development accords with the relevant policies of the development plan referred to above.

6.25 London Plan Policy 5.3, the Mayor's Sustainable Design and Construction SPG and HLP policies EQ1 and EQ2 seek other sustainability measures in addition to the energy considerations addressed above. The Sustainability Statement submitted in support of the application includes a BREEAM Pre-Assessment report for the proposed development that demonstrates how the proposed development could achieve an 'Excellent' rating in accordance with current policy and the proposal can therefore be considered to be sustainable, using the criteria within Hounslow's Local Plan, the GLA Sustainable Design and Construction SPG and the London Plan.

### **Flood Risk and Drainage**

6.26 The site is in Flood Zone 1 and is less than 1 hectare, as such a Flood Risk Assessment is not required. A Drainage Statement has been prepared, using the Council's Drainage Assessment Form, and accompanies this application. This follows the London Plan drainage hierarchy (Policy 5.13) in considering various methods to discharge surface water. The proposal incorporates the attenuation of rain water through cellular storage crates before the water is pumped into a surface water sewer. The SuDS water management proposals are therefore considered to be acceptable in compliance with London Plan Policy 5.13 and HLP policy EQ3.

### **Transport**

6.27 HLP Policy EC2 seeks a more sustainable local transport network that maximises opportunities for non-car forms of transport and reduces congestion. The policy refers to the parking standards in the London Plan and says that in suburban areas of low public transport accessibility the Council may seek a provision of car parking at the maximum level. It also requires that Transport Assessments demonstrate that adverse impacts on the transport network can be avoided and that travel Plans are prepared.

6.28 The Transport Statement ('TS') submitted with the application notes that despite the PTAL rating of 2, the site is served by local bus routes and Syon Lane station which provides easy access to central London. It goes on to estimate that the proposed development will generate around 2.5 times the existing vehicle movements associated with the existing facility, which only represents an additional 6 or 7 trips in each peak period and equates to approximately one trip every 8-10 minutes. It concludes that *"Such a level of trip generation is considered to be imperceptible on the local, and wider, highway network"*.

6.29 The TS confirms the proposed car parking meets the London Plan standards and that all car parking is expected to be accommodated within the site. Much of the surrounding area is covered

by a controlled parking zone (CPZ) therefore there is unlikely to be any impact on parking in the local streets around the proposed development.

6.30 A Travel Plan Statement is included within the TS which describes the measures to be adopted in order to encourage sustainable travel.

6.31 On the basis of the above the proposed development meets the objectives of HLP Policy EC2.

### **Air Quality**

6.32 London Plan Policy 7.14 is concerned with tackling air pollution and refers to the best practice in the ‘The Control of dust and emissions from construction and demolition’ SPG (2014) as well as promoting ‘air quality neutral’ development particularly within Air Quality Management Areas (AQMA).

6.33 HLP Policy EQ4 similarly seeks to reduce the potential air quality impacts of development and promote improved air quality conditions across the borough; further detail is provided in the Council’s Air Quality SPD (2008). The whole borough is allocated as an AQMA with road transport being the major source of air pollution.

6.34 An Air Quality Assessment has been undertaken by WYG and accompanies this application. It considers potential effects during the construction phase of the proposed development as well as potential operational stage effects. In respect of the former, mitigation measures are identified based on IAQM Guidance, in order to mitigate risk of significant adverse effects, in accordance with London Plan Policy 7.14 and the Mayor’s SPG.

6.35 For the operational year of the development of 2019, the assessment of the effect of emissions from traffic associated with the scheme, has determined that the maximum predicted increase in the annual average exposure to NO<sub>2</sub> at any existing residential receptor is likely to be 0.01 µg/m<sup>3</sup> at all existing receptor locations. The assessment of the significance of the effects of the proposed development with respect to NO<sub>2</sub> exposure is determined to be ‘negligible’ for all receptors. With respect to predicted PM10 exposure, the significance of the proposed development is determined to be ‘negligible’. The development is considered to be ‘Air Quality Neutral’ in accordance with the London Plan guidance. In conclusion, the proposed development is not considered to be contrary to the relevant development plan policies.

### **Contamination**

6.36 London Plan Policy 5.21 and HLP Policy EQ8 seek to ensure that development proposals take account of potential effects associated with development of contaminated land. Policy EQ8

requires adequate site investigation information to be provided with development proposals and an assessment of the suitability of the site for the type of development proposed.

- 6.37 SLR has completed a Phase 1 Environmental Assessment. This included a site visit/walkover, an assessment of sensitivity and environmental setting, a review of land use history, review of public register information available via Groundsure and a preliminary qualitative risk assessment.
- 6.38 The report concludes that *“based on the available information it is considered that there is a Moderate/Low risk from historical sources of potential contamination to a sensitive groundwater receptor and human health”*. As the proposed development includes a basement, the assessment identifies potential for gases to accumulate in the void; consequently the report recommends a limited investigation to further determine whether this is a plausible risk. Once this is complete it will enable the risk to be further assessed and will identify any necessary mitigation measures to ensure no adverse effects from contamination, if present. This is consistent with the requirements of London Plan Policy 5.21 and HLP Policy EQ8.

## 7.0 CONCLUSION

- 7.1 The proposed development seeks to re-provide and expand the existing warehouse and associated office facilities currently on the application site in order to meet the current and future needs of this local business. It is envisaged to increase the number of people employed from 17 to at least 35 people. The proposed development meets the specific locational requirement of part (c) of HLP Policy ED1 which directs warehouse and associated development to existing industrial sites; it is also consistent with the general economic development thrust of policy ED1 and national and London Plan policies.
- 7.2 The proposed development makes optimum use of previously developed land and its scale and massing responds well to both the character of the area and the residential dwellings in the surrounding environs, including dwellings on Warkworth Gardens and the proposed dwellings subject of the parallel application by the same applicant at Land North of Northumberland Avenue.
- 7.3 The proposed development incorporates a range of sustainable design measures to minimise energy use, achieve BREEAM Excellent rating and carbon dioxide savings as well as sustainable drainage system measures to reduce surface water run-off and improve water quality. The proposed development will therefore make a valuable contribution to suitable development objectives.
- 7.4 As there are no adverse impacts that would significantly outweigh the benefits of the proposed development and that the benefits are in accordance with the objectives of the Development Plan, related supplementary planning guidance and advice notes and national policy, the Proposed Development should therefore be supported as a sustainable form of development and the application be approved without delay in accordance with the NPPF.

## **APPENDIX 1: COUNCIL'S PRE-APPLICATION ADVICE LETTER OF 12 APRIL 2017**



Regeneration, Economic Development  
and Environment Department  
Executive Director: Brendon Walsh  
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**Development Management**  
**London Borough of Hounslow, The Civic Centre,**  
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**Your contact:** Melek Ergen  
**Direct Line:** 020 8583 5166  
**Email:** [melek.ergen@hounslow.gov.uk](mailto:melek.ergen@hounslow.gov.uk)  
**Our ref:** 00505/891/PRE1  
PRE/2016/5280  
**Date:** 12 April 2017

Dear Mr Jassal,

**891 Great West Road, Isleworth TW7 5PD – Proposed redevelopment of the site.**

Further to your meeting about 891 Great West Road with my colleague Melek Ergen, I write to confirm the details of your discussion and our advice. Please accept my apologies for the delay. The sensitive nature of the site and its setting required careful consideration.

**Site appraisal**

- The site is on the south side of the Great West Road, west of the junction with Syon Lane.
- The site is occupied by an Art Deco (completed in 1934) office and warehouse building and occupied by the Adini clothing company. The building is part single storey and part two-storey on the corner with parapet copings with white render. Warehouses occupy the rear with pitched corrugated roofs and masonry walls.
- There is car parking in the front and rear parts of the site.
- To the rear facing Northumberland Road and to the west is the remnant of a tall historic garden wall built in English bond in red multi stock bricks. There is a fine neo-classical blind filled triumphal arch gateway with niches either side and Portland stone dressings which are its main feature.
- To the east is a vacant plot used as a temporary car park. It is the subject of a planning application under consideration for a building up to 11 storeys to provide offices, three basement levels of storage and 102 flats.
- To the west, the site adjoins maisonettes fronting Warkworth Gardens and to the south, beyond Northumberland Avenue the area comprises two storey pitched roof dwellings.
- The site contains twenty car parking spaces for the existing commercial use accessed from Great West Road. The site has a public transport accessibility ('PTAL') level of 2 which indicates the poor level of public transport access.

## The proposed development

- We understand from the submission that the existing office and warehouse use would be maintained on site. However due to the state of the existing building, to repair and extend the building some flats are proposed to cover the costs.
- During the meeting, we explained the Council's concern about the proposed demolition of the building and the historic wall to you and your client and we requested a Heritage Statement for both; which you carried out and submitted to the Council on 7 March 2017 with several other options to further develop the site. Thank you for this further information and the condition survey.
- In light of the submitted information, I can confirm that our preference is for option 4 (keeping the existing building and historic wall) subject to reducing the flats to three storeys and subject to satisfactory accessibility, design, quality of housing (internal and amenity space, outlook, etc.) and impact on neighbours. However, please note that the development would not be considered an enabling development and a Viability Assessment is required with any submission.
- We have, however, discussed and read through the submitted documents and weighed the argument about keeping the existing building and historic wall. Considering the Great West Road is changing, we decided not to insist on keeping the existing Art Deco building to the front but only the historic walls.
- The building fronting Great West Road in your option 1 is inspiring and reflects the existing character of the building, due to its close proximity to the maisonettes along the Warkworth Gardens we are concerned that the proposed four storeys would result in loss of light to and an unacceptable outlook from these dwellings. Although the road can take some height, due to the impact on the maisonettes on Warkworth Gardens and the potential development to the east we would suggest that you keep to two storeys at the front.
- Within the site you might increase the height of the building up to four storeys, always providing there would be no harm to the neighbouring maisonettes, which you would have to demonstrate.
- The proposed residential block to the rear should be a maximum of three storeys, providing a transition from the four storey proposal to the north to the two storey dwellings to the south.
- You must make sure that the proposed dwellings comply with the Nationally Described Space Standards (NDSS) as mentioned by Local Plan policy SC5. Your current proposal does not comply. The deduction of private amenity space from the communal area would be accepted, but private and communal amenity spaces should also align with policy SC5.
- You may consider having some terraced or semi-terraced housing to the rear. These would provide better quality housing and better reflect the character of the surrounding area.
- Whilst a car free development is acceptable, please provide a transport statement to justify this. We would restrict residents from obtaining parking permits for the surrounding controlled parking zone (CPZ).
- Policy SC3 details the Council's housing mix need. See the table below. This mix is required to comply with the Local Plan.

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

- We have concerns about the quality of proposed flats. Due to the existing walls and the proposed access road to the east as well as the new proposed four-storey building within the site, we are not convinced that the flats would have an acceptable outlook and we would need to be reassured about this by evidence in any application. Furthermore, there would be a loss of privacy to the neighbouring due to the distance of the proposed dwellings to the Warkworth Gardens maisonettes.
- A detailed Building Research Establishment (BRE) daylight and sunlight analysis is required to show if the rooms comply with Average Daylight Factor ADF target values and the results of the annual probable sunlight hours (APSH) test to demonstrate acceptable sunlight and that all rooms would meet the BRE Guidance.
- Thus you would need to convince us about both the quality of housing and amenity spaces.
- In addition, the proposed four-storey building should not overshadow the neighbouring existing and proposed dwellings.

### **Sustainability**

- All new housing must comply with London Plan energy and carbon reduction targets.
- London Plan Policy 5.2 seeks to ensure reduction in CO2 emissions. Local Plan policy EC1 supports this and seeks to minimise the demand for energy and to promote renewable and low carbon technologies. Local Plan policy EC2 seeks to promote the highest standards of sustainable design and construction in development to mitigate and adapt to climate change.
- An Energy Statement and the Council's Sustainability checklist should be submitted to set out how the energy hierarchy has been incorporated into the design of the development in order to detail how a carbon dioxide emissions reduction against Part L (2013) can be achieved.
- It is likely that there would be conditions relating to water efficiency and sourcing of materials to ensure that the development would meet London Plan requirements relating to water usage reduction and sustainable material sourcing.

### **Community Infrastructure Levy and s106**

- LB Hounslow adopted its Community Infrastructure Levy (CIL) charging schedule on 1 July 2015. In summary, the charge is £110/m<sup>2</sup> gross internal floor space. You can find details of the LB Hounslow CIL Charging Schedule and how it applies to development on our website.
- The Mayor of London's CIL would also apply at a rate of £35.00/m<sup>2</sup> gross internal floor area.
- Your client must complete and submit the 'Determining whether a Development may be CIL Liable' form, available from the website, with any planning application.

### **Affordable housing**

- London Plan Policy 3.12 also states that, in negotiating affordable housing in private schemes, Boroughs should seek the maximum reasonable amount of affordable housing having regard

to their affordable housing targets, the need to encourage rather than restrain residential development and the individual site circumstances. Local Plan policy SC2 sets a target for 40% of on-site delivery of affordable housing. The mayor of London's aspiration is 50%. In those cases where the provision is lower than the policy requirement, an open viability assessment is required.

- A full viability assessment is a validation requirement for such cases and this will be checked by a third party that the Council appoints at your client's expense. Please also note that the submitted viability assessments will be published on the Council's website and accessible by the public.

You will also need Building Regulation Approval for the work. To find out more, please ring 020 8583 5403/04 (email: [buildingcontrol@hounslow.gov.uk](mailto:buildingcontrol@hounslow.gov.uk)). My colleagues will be pleased to tell you about the services they offer.

## **Conclusion**

As it stands, as explained above, the Council would refuse planning permission for any of these proposals.

However, there is a possibility to improve the office and warehouse accommodation at the site. You may do so either keeping the existing buildings and improving or demolishing the Art Deco building to provide a two-storey replacement reflecting existing character and present era to the front and four storey in the middle of the site ensuring no harm to the surroundings. The Council is concerned with the proposed housing development especially in terms of the quality of accommodation proposed, and very significant changes would be necessary.

In the light of this I suggest, when you progress your proposal further, that you arrange a follow up meeting to discuss it again in detail.

Any further meeting about this project will incur a charge at half the initial rate applicable at the time of the meeting. If you wish to engage in a lengthy pre-application dialogue, you may find it better to enter into a Planning Performance Agreement with us and Ms Ergen will be happy to provide you with details of what this service offers and the fees involved.

Please note this correspondence serves as an officer's opinion only and is not binding on the Council's decision on any future planning application, but we hope that it will help you produce a scheme with a better chance of receiving planning permission.

We provide these views in good faith and without prejudice to formal consideration of any planning application, which will be subject to formal consultation and ultimately decided by the Council. We cannot guarantee that any application would be valid or would be approved. If there is a material change in circumstance or new information now comes to light then less weight may be given to the content of this letter.

To find planning application forms, go to [www.hounslow.gov.uk/planning\\_application\\_forms.htm](http://www.hounslow.gov.uk/planning_application_forms.htm). You will also find our application validation requirements on our website.

If you have any further questions please do not hesitate to contact Melek Ergen on 020 8583 5166.

Yours sincerely,



**Robert Coomber**  
Central Area Planning Manager