



Chartered Surveyors and Town Planners

21 Garlick Hill,
London, EC4V 2AU
T: 020 7489 0213
F: 020 7248 4743
E: info@dwdllp.com
W: dwdllp.com

Linked 

PLANNING STATEMENT

**PROPOSED RESIDENTIAL DEVELOPMENT AT
LAND NORTH OF NORTHUMBERLAND
AVENUE AND SOUTH EAST OF ADINI, 891,
GREAT WEST ROAD, ISLEWORTH TW7 5PD**

Date: November 2017

Ref: 12510

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CONTENTS

1.0 INTRODUCTION	1
2.0 SITE AND SURROUNDINGS	4
3.0 PLANNING HISTORY AND PRE-APPLICATION ADVICE	6
Planning History	6
Pre-application Advice	7
4.0 THE PROPOSED DEVELOPMENT.....	9
5.0 THE DEVELOPMENT PLAN AND OTHER MATERIAL CONSIDERATIONS.....	11
The London Plan	11
Hounslow Local Plan	12
Other Material Considerations	12
6.0 PLANNING ASSESSMENT	14
Principle of Proposed Residential Development	14
Residential typology/standards	14
Heritage and Design.....	17
Impact on Neighbouring Residential Amenity.....	19
Flood Risk and Drainage.....	20
Transport.....	21
7.0 CONCLUSION	23

TABLES

Table 1: Planning History.....	6
Table 2: Hounslow Housing Need Mix Requirements.....	16

FIGURES

NO TABLE OF FIGURES ENTRIES FOUND.

APPENDICES

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

Revision	Description	Originated	Checked	Reviewed	Authorised	Date
	First draft	AJC	JB	JB	JB	7/11/17
	Final	AJC	JB	JB	JB	28/11/17
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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 development of land at 891 Great West Road for residential purposes.
- 1.2 Songkarn Ltd, which trades as Adini, a wholesale and online clothing and fashion retail company 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 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. The commercial development is the subject of a separate but related application for planning permission.
- 1.3 In order to fund the construction of its new commercial premises, the applicant is seeking planning permission under this Application for a residential development on the land within its ownership to the rear of its existing warehouse and office building, referred to in this Application as land to the north of Northumberland Avenue ('the application site'). The remainder of the Adini site, referred to as 891 Great West Road, is the subject of the separate planning application for the commercial development.
- 1.4 The application site is primarily hardstanding providing car parking spaces as well as including a garage building and a small portion of the existing Adini warehouse. As the application site adjoins Northumberland Avenue it provides the opportunity to separate it off and develop it independently of the commercial uses on the rest of the Adini site.
- 1.5 The Application proposes the *"Demolition of existing buildings and 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"* ('proposed development').
- 1.6 The proposed development represents a significant opportunity to provide a high quality residential development of 16 new residential units in this accessible and sustainable location. The principle of development is in accordance with the adopted development plan policies and has been accepted by the Council in its pre-application advice.
- 1.7 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 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.

1.8 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.

1.9 A Design and Access Statement prepared by Satish Jassal Architects details the urban design concept and design evolution of the Proposed Development.

1.10 This Statement should be read in 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 – Historic Boundary Walls by Caroe Architecture;
- Condition Survey – Historic Boundary Walls by Caroe Architecture;
- Energy Statement by AJ Energy;
- Sustainability Statement by AJ Energy;
- Daylight and Sunlight Report by Waterslade;
- Drainage Assessment Form by EAS;
- Transport Assessment by EAS;
- Air Quality Assessment by WYG; and
- Phase 1 Land Contamination Assessment by SLR.

1.11 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 will provide a high quality development that makes a valuable contribution towards much needed housing in this part of London as well as facilitating the delivery of expanded and improved commercial premises for Adini, a growing local business.

2.0 SITE AND SURROUNDINGS

- 2.1 The application site is outlined in red on the 'existing location plan' (ref. 133-060-EX-LOC) and is a broadly rectangular parcel of land of approximately 795 square metres located adjacent and to the north of Northumberland Avenue. It currently comprises hardstanding providing 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.
- 2.2 The land to the north-west is the remaining portion of the Adini site at 891 Great West Road and is delineated in blue since it is also owned by the Applicant. That part of the Adini 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 south-eastern boundary of the application site is delineated by a historic brick wall which contains neo-classical arched openings that have been infilled with fletton bricks. In its current form the wall prevents direct access from Northumberland Road.
- 2.4 To the north-east of the application site is the 'Gillette South' site which previously contained a petrol filling station but up until recently been used for the parking of vehicles. The Gillette South site was 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 para. 3.2 below for further details).
- 2.5 Directly to the west of the application site are the gardens of the residential properties on Warkworth Gardens. The historic brick wall extends along the boundary between the application site and these properties and due to its height (approximately 2.5m) provides a good degree of screening and separation.
- 2.6 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.
- 2.7 The site is not located within a Conservation Area and does not contain and statutory or locally listed buildings. The Grade II listed Gillette building is located some 115m to the north east although the application site is not considered to be within its setting.

- 2.8 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.
- 2.9 The Design and Access Statement (DAS) provided 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 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”*. 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 that loss, or*

that the public benefits of the proposal would 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 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

- 3.3 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 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 in paragraphs 3.4 to 3.99 below.

November 2016 Submission

- 3.4 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.
- 3.5 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 Ltd were appointed to produce a Heritage Statement and condition survey for both the Adini building and the historic boundary wall.

March 2017 Submission

- 3.6 The second pre-application submission made on 17 March 2017 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.
- 3.7 Heritage Statements and Condition 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 repair and was much altered in the past with some of the later alterations previously described detracting from its overall significance. In terms of the boundary wall, the Heritage Statement identified at least two locations where the rear wall has former openings in the public facing section of wall that have been filled in and the opening up of these as part of a development proposal would represent a heritage benefit.
- 3.8 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's advice letter advised that the residential element should be a maximum of three storeys, however in the subsequent verbal advice acknowledged that our storeys could be achievable provided the building is split into two separate blocks in order to break the mass of the proposed scheme when viewed from Northumberland Avenue.
- 3.9 The applicant has reviewed and considered all advice from the Council in both pre-application responses and subsequent correspondence which has shaped 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 Design and Access Statement (DAS) as well as the other submitted documents and drawings listed in paragraph 1.10 above.
- 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 building to provide 16 self-contained flats, provision of private and shared amenity space, cycle parking, hard and soft landscaping and associated development”*. The reference to the buildings to be demolished refers to the garage building and the portion of the Adini warehouse on the application site.
- 4.3 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 Adini site (referred to as 891 Great West Road) to provide replacement commercial premises with increased warehouse and office space. 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 considered unlikely. Nevertheless, for robustness the technical assessment accompanying this Application considers both scenarios.
- 4.4 The proposed development subject of this Application would provide a total of 16 residential flats comprising 4 x 1-bedroom/2-person, 8 x 2-bedroom/3-person and 4 x 3-bedroom/4-person flats as summarised below.

Bedrooms	People	Number	Percentage of total
1	2	4	25%
2	3	8	50%
3	4	4	25%

- 4.5 All residential units have private amenity space in the form of either balconies or in the case of the four ground floor units, private gardens/patios. The Proposed Development also provides shared amenity space to the front of the building by way of a courtyard-style space at ground floor and shared balcony at first floor of approximately 45sqm and 9sqm respectively, as well as a large landscaped garden to the rear providing approximately 236sqm.

- 4.6 The proposed development includes opening up the infilled brick arches in the historic boundary wall along the south-western boundary in order to provide pedestrian access to the dwellings from Northumberland Avenue. Introducing views through the historical wall where openings once existed in the past is considered to provide heritage benefits. The residential development will not be accessible from the north and a perimeter fence is proposed in order to separate the scheme from the proposed commercial element.
- 4.7 The proposed development will be car free which was supported by the Council at the pre-application stage. Secure and sheltered cycle storage with capacity for 32 spaces is provided for residents and one visitor cycle parking space. Waste and recycling bin store is also provided within 10m of the roadside.

5.0 THE DEVELOPMENT PLAN AND OTHER 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 policies are considered relevant to the consideration of the proposed development:

- 3.3 – Increasing Housing Supply
- 3.4 – Optimising Housing Potential
- 3.5 – Quality and Design of Housing Developments
- 3.8 – Housing Choice
- 3.11 – Affordable Housing Targets
- 3.12 – Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- 3.13 – Affordable Housing Thresholds
- 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
- SC1 – Housing Growth
- SC2 – Maximising the Provision of Affordable Housing
- SC3 – Meeting the Needs for a Mix of Housing Size and Type
- SC4 – Scale and Density of New Development
- SC5 – Ensuring Suitable Internal and External Space
- 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

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.
- 5.5 LPA's are required by the NPPF (Paragraph 23) to recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.

5.6 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*”.

5.7 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*”.

[Mayor of London Supplementary Planning Guidance](#)

5.8 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:

- Affordable Housing & Viability (August 2017)
- Housing SPG (March 2016)
- Sustainable Design and Construction (April 2014)

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

5.9 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.

5.10 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.

6.0 PLANNING ASSESSMENT

Principle of Proposed Residential Development

- 6.1 The NPPF seeks to significantly boost the supply of housing throughout the country. Paragraph 49 of the NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development. Paragraph 50 supports the delivery of a wide choice of high quality homes, increasing opportunities for home ownership and the creation of sustainable, inclusive and mixed communities. The NPPF also encourages the reuse of previously developed land (in paragraph 111).
- 6.2 London Plan (policy 3.3) affirms that the Mayor's commitment to increase the supply of housing in London over the ten-year period from 2015-2025, specifying minimum targets for each borough to achieve, or preferably exceed, during that time. Hounslow is expected to deliver 8,222 new homes within that timescale, based on a strategic target of 822 dwellings per annum.
- 6.3 HLP Policy SC1 addresses the Council's housing growth strategy which seeks to maximise the supply of additional housing in the Borough, in a manner which is consistent with sustainable development principles. It is therefore important for housing to be built at a rate that will meet the London Plan's increased annualised completion targets. The Proposed Development would therefore make a valuable contribution of 16 residential units towards the delivery of new homes to aid achieving this local, regional and national objective.
- 6.4 The application site does not have a specific policy allocation and the principle of a residential development on brownfield land in this sustainable and accessible location is supported in the adopted Hounslow Local Plan. The Council has confirmed at the pre-application stage that the principle of development at this site is acceptable.

Residential typology/standards

Density

- 6.5 HLP Policy SC4 states that the density of new housing development will balance the need to make efficient use of land and achieve high quality design and accessibility, whilst responding to and reflecting local context and character and protecting existing residents' amenity. London Plan Policy 3.4 states that development should optimise housing output in line with the relevant density range in Table 3.2. Paragraph 3.28 of the London Plan sets out that it is not appropriate to apply Table 3.2 mechanistically and that other factors relevant to optimising potential should be taken into account.

6.6 The application site measures approximately 0.08 hectares (ha) and is located in an urban area with a PTAL of 2. Table 3.2 of the London Plan identifies a density of 70-170 units/ ha based on the mix proposed, which equates to three habitable rooms per unit. The application proposes 16 residential units with a total of 48 habitable rooms which equates to a density of 200 units/ha. Whilst the proposed development is slightly above the indicative density range it makes efficient use of the land and provides a high quality design and standard of accommodation whilst satisfying all other planning policies in accordance with HLP Policy SC4 and London Plan Policy 3.28.

Affordable Housing, Tenure and Mix

6.7 London Plan Policies 3.10, 3.11, 3.12 and 3.13 all relate to the provision of affordable housing. Of particular relevance to this application, Policy 3.11 sets an annual average target for affordable housing delivery in London and encourages boroughs to identify their specific needs and set appropriate targets. Policy 3.12 requires that on individual schemes “the maximum reasonable amount of affordable housing should be sought” which should have regard to strategic and local targets, as well as “*the need to encourage rather than restrain residential development*” Both policies require development viability to be taken into consideration.

6.8 The Mayor’s Affordable Housing and Viability Supplementary Planning Guidance (2017) (‘the AHVA SPG’) provides detailed guidance on viability assessments, including that the Mayor’s preference is that when assessing the viability of a proposal, the comparable Benchmark Land Value should be Existing Use Value Plus. The SPG explains that “*The premium above Existing Use value will be based on site specific justification reflecting the circumstances that apply*” (paragraph 18, AHVA SPG).

6.9 HLP Policy SC2 reflects the London Plan position on affordable housing. It sets a strategic borough-wide target of 40% affordable housing and requires all developments to provide an open book viability assessment to demonstrate that the maximum provision of on-site affordable housing is being proposed. The policy states that where a proposed development can only support less than 40% affordable housing, a review mechanism will be employed upon partial or full completion.

6.10 The viability of the proposed development has been assessed and found not to be able to viably support any affordable housing under current market conditions.

6.11 London Plan Policy 3.8 encourages new development to offer a range of housing choices in terms of mix and housing sizes and types. HLP Policy SC3 seeks the following mix of housing, unless

otherwise agreed on the basis of evidence. Section b of HLP Policy SC3 advises that the Council will negotiate the housing mix requirements for each development using the mix summarised in Table 2 as a starting point for consideration.

Table 2: Hounslow Housing Need Mix Requirements

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

- 6.12 The development proposes 16 residential units comprising 4 x 1-bedroom, 8 x 2-bedroom and 4 x 3-bedroom units, which represents 25%, 50% and 25% respectively. As explained above, no affordable housing is proposed and the housing is 100% market housing.
- 6.13 As identified in Policy SC3, the Council's preferred housing mix is a starting point for the consideration of applications for residential development. It is considered that the proposed mix is sufficiently close to this bearing in mind the specifics of the scheme, its compliance with residential design standards and the relatively high provision of family-sized / 3-bedroom units.

Quality

- 6.14 London Plan Policy 3.5, HLP Policy SC5 Ensuring Suitable Internal and External Space and the Mayor's Housing SPG all promote good quality in new housing developments.
- 6.15 The Proposed Development is of high quality design and complies with the guidelines set out in the Mayor's Housing SPG.
- 6.16 The detailed plans and elevations demonstrate how the above standards can be achieved and exceeded. The DAS also includes a full schedule of accommodation which confirms that all residential units meet the minimum space standards in the London Plan. The layout of the Proposed Development has been carefully designed to respect the dwellings on Northumberland Avenue to the south and Warkworth Gardens.
- 6.17 In terms of residential quality, there will be no north facing single aspect units and all the units will be dual aspect thus ensuring all units will have an acceptable outlook and are in accordance with HLP Policy SC5 and the Housing SPG
- 6.18 HLP Policy SC4 sets an expectation that development proposals will comply with prevailing daylighting standards with reference to the Building Research Establishment ('BRE') Guidance.

The Daylight & Sunlight Report submitted with the application assesses the level of daylight within proposed residential units based on a calculation of the average daylight factor ('ADF'). This concludes that all but two habitable rooms will achieve the relevant ADF value according to the BRE Guidance and the British Standard. The two exceptions are both open plan Living/Kitchen/Dining rooms which exceed the ADF values for living rooms and on balance this is considered acceptable and representative of good levels of day light in all habitable rooms. The proposed communal rear garden will also receive good levels of sunlight in accordance with the BRE guidance.

Amenity Space and Play Space Provision

- 6.19 All units are designed with private amenity space that meets the requirements of the London Plan Housing SPG and HLP Policy SC5 which require 5sqm of private outdoor space for 1-2 person dwellings and an extra 1 sqm for each additional occupant.
- 6.20 As detailed in the area schedule within the DAS, all the residential units meet or exceed the above policy requirement for private amenity space in the form of balconies and in the case of the ground floor units, individual private gardens.
- 6.21 The Proposed Development is below the threshold to provide play provision on site according to the Mayor's Shaping Neighbourhoods and Informal Recreation SPG; however applying the child yield calculator the Proposed Development has a Child Yield of 1. HLP Policy SC5 requires communal space to be provided on the basis of 25sqm for each dwelling less the amount of private amenity space. As set out in the area schedule in the DAS this equates to a requirement of 265sqm of communal space.
- 6.22 The Proposed Development includes a large shared amenity space to the rear which provides 236sqm. The courtyard at the front provides a further 45sqm and there are communal balconies providing a further 9sqm. The overall provision of 290sqm therefore exceeds the HLP requirement. On the basis of the above, it is considered that the Proposed Development provides amenity space of sufficient quality and quantity for future residents.

Heritage and Design

- 6.23 During pre-application, the Council, in its first pre-application advice to the Applicant in November 2016, identified concern about the demolition of the existing Art Deco building as officers 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 historic and architectural importance and was worthy of retention and repair.

6.24 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 site and the southern 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 and are provided with this Application.

Art Deco Building

6.25 The Heritage Statement for the existing Art Deco building identified 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.

6.26 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. If not addressed the building will continue to slowly deteriorate and will in itself become a detracting feature in the townscape.

6.27 Subsequent to the submission of the Heritage Statement, the Council issued pre-application advice in April 2017 (Appendix 1) that identified the Council was comfortable with the demolition of the existing Adini building as part of the Proposed Development.

Southern Boundary Wall

6.28 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 18th 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.

6.29 The Statement concludes that in retaining and conserving the neo-classical triumphal arch gateway and some of the surrounding walls that the townscape and heritage value will not be compromised or destroyed if the remaining sections of the wall were lost. By introducing views through the historic wall where openings once existed in the past, the Proposed Development would add to the public experience of the asset and improve its interpretation as a former gateway and walled garden.

6.30 The Proposed Development incorporates this recommendation into the design and opens up two existing brick arches in the wall to provide pedestrian access to the residential development. It is

considered that this improves the interpretation of the wall as a gateway and restores its association with the former Sion Hill House Estate; as well as enhancing its setting and revealing its significance.

- 6.31 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

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

- 6.32 HLP Policy CC2 seeks high quality urban design as part of development proposals, which should among other factors *“ensure sufficient sunlight and daylight to...adjoining/adjacent dwellings”*.
- 6.33 As such the Daylight & Sunlight Report submitted considers the impact of the proposed development (including the cumulative effect of the proposed commercial development on the site at 891 Great West Road to the north-west) on the adjacent residential properties on Warkworth Gardens and on the opposite side of Northumberland Avenue at 1-7 Hexham Gardens. The assessment concludes that the assessed impact largely complies with the default BRE Guidance and *“whilst there are localised impacts, in each case these are reasonable and compare favourably with appropriate urban daylight levels”*.
- 6.34 The report notes that due to the low-rise nature of the existing site any development which optimises the potential of the site will inevitably have some noticeable proportional reductions in daylight level, however ‘noticeable’ is not be equated with ‘unacceptable’. It concludes that the assessed level values of 22% or more represent a good level of daylight that is commensurate with or better than those found in other desirable regions of London. The gardens to the neighbouring residential properties will not be significantly impacted and will continue to receive good levels of sunlight in accordance with the BRE Guidance.
- 6.35 As such the proposed development is considered to meet the objectives of HLP policy CC2.

Energy and Sustainability

- 6.36 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.
- 6.37 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.
- 6.38 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 lighting, in excess of the Part L1 2013 requirements, applying the London Renewables Toolkit methodology.
- 6.39 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, installing a community heating system and use of CHP but concludes that these are not feasible. Photovoltaic panels are feasible and to be included as part of the proposed development. This combined with the energy efficiency measures equates to a reduction of 36.8% against the TER 2013. On this basis the proposed development accords with the relevant policies of the development plan referred to above.
- 6.40 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. Accordingly a Sustainability Statement accompanies this application and demonstrates how the proposed development complies with these policy objectives and as such should be considered sustainable.

Flood Risk and Drainage

- 6.41 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

- 6.42 HLP Policy EC2 aims to secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being. As such it promotes 'car-free' development.
- 6.43 The proposed development does not include any on-site vehicle parking. 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. Furthermore the site is well served by good quality footpaths, pedestrian crossings and cycle routes and is within easy walking and cycling distance of local shops and a major supermarket. Isleworth and Brentford town centres are both around 1.5k from the site. As such it is considered that future residents of the proposed development will be able use non-car forms of transport for every day life. There are also car club locations within 30 minutes' walk of the site.
- 6.44 Northumberland Avenue is covered by the Syon Lane Controlled Parking Zone (CPZ) and consultation is underway about a new CPZ in the local area. This provides an opportunity, to control the ability of future residents of the proposed dwellings to obtain permits to park on roads surrounding the site, in accordance with Policy EC2.

Air Quality

- 6.45 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's).
- 6.46 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.
- 6.47 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 in order to manage potential risk of adverse effects from emissions in accordance with London Plan Policy 7.14 and the Mayor's SPG.

6.48 As the proposed development is 'car-free' with no associated daily motorised trips it is considered to be 'air quality neutral', and consistent with the objectives of London Plan Policy 7.14, HLP Policy EQ4 and the associated SPG.

Contamination

6.49 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.

6.50 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. 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 such the assessment recommends further soil investigation works to assess the status of any groundwater and confirm the soil gas regime. 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 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 company's needs and in order to sustain and develop its business operations in Isleworth, Adini 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.
- 7.2 In order to fund the construction of its new commercial premises, Adini is seeking planning permission under this Application for a residential development on the land within its ownership to the rear of its existing warehouse and office building, referred to in this Application as land to the north of Northumberland Avenue. The application site is previously developed land and adjoins Northumberland Avenue (which is primarily residential in nature) providing the opportunity to separate it off and develop it independently of the commercial uses on the rest of the Adini site.
- 7.3 The proposed development therefore represents a significant opportunity to provide a high quality development of 16 new residential units in this accessible and sustainable location. The residential mix includes 25% three-bedroom homes and the proposed development will deliver high quality living accommodation with generous private and shared amenity space. Furthermore, the proposed development maximises the use of the application site whilst having been designed to minimise impacts on the occupiers of adjacent properties.
- 7.4 The scale of the building reflects the footprint and plot ratios of surrounding development and introduces a sensitive stepping up in height from the two-storey residential properties to the west and south and the larger scale of existing and likely future development to the north and east. The architectural design and proposed materials of the building is considered appropriate for the application site and will provide benefits to visual amenity of the area. The retention, restoration and enhancement of an existing historic wall will create an attractive street scene frontage to the residential development.
- 7.5 This Planning Statement and the supporting technical documents demonstrate that the proposed development is in accordance with the adopted development plan policies. The proposed development therefore represents a valuable contribution to housing delivery as well as facilitating the delivery of expanded and improved commercial premises for Adini, a growing local business.

- 7.6 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
Email: planning@hounslow.gov.uk

Development Management
London Borough of Hounslow, The Civic Centre,
Lampton Road, Hounslow, TW3 4DN

Satish Jassal
Satish Jassal Architects
19 Wharfdale Road
London
N1 9SB

satish@satishjassal.co.uk

Your contact: Melek Ergen
Direct Line: 020 8583 5166
Email: 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/m² 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/m² 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). 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. 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