



Concorde Close

London Borough of Hounslow

Planning Statement

Prepared by:

Barton Willmore

On behalf of Home Group

September 2018

Concorde Close, Hounslow TW3 4DG

Planning Statement

Prepared by Barton Willmore LLP on behalf of Home Group

Project Ref:	27702/A5/Planning Statement
Status:	Final
Issue/Rev:	01
Date:	28 September 2018
Prepared by:	Brittany Williams
Checked by:	Victoria Bullock
Authorised by:	Victoria Bullock

Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: 020 7446 6888
Fax: 020 7446 6889
Email: Victoria.Bullock@bartonwillmore.co.uk

Ref: 27702/A5/BW

Date: 28 September 2018

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

1.0 INTRODUCTION	1
2.0 APPLICATION SITE AND SURROUNDINGS	4
3.0 PLANNING, CUSTOMER AND COMMUNITY ENGAGEMENT	6
4.0 THE PROPOSED DEVELOPMENT	11
5.0 PLANNING POLICY CONTEXT.....	15
6.0 CASE FOR DEVELOPMENT	26
7.0 SUMMARY AND CONCLUSIONS	51

APPENDICES

APPENDIX 1	:	PPA1 OFFICERS WRITTEN RESPONSE, DATED 2 OCTOBER 2017
APPENDIX 2	:	PPA3 OFFICERS WRITTEN RESPONSE, DATED 25 JULY 2018
APPENDIX 3	:	PROPOSED ACCOMMODATION SCHEDULE, PREPARED BY FARRELLS

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Home Group Ltd ('The Applicant') in support of a full planning application for Concorde Close, Hounslow TW3 4DG ('the Site'). The application seeks planning permission for:

Demolition of existing Concorde Close, and redevelopment to provide two new build blocks comprising up to 6 storeys in height, comprising 124 Class C3 dwelling houses. Creation of new play space, landscaping, and associated residential car parking (including disabled), cycle parking, access and servicing.

1.2 Home Group is one of the UK's biggest housing associations and largest providers of new homes and houses for affordable rent. For Home Group, regeneration is about more than bricks and mortar; creating sustainable communities where people can thrive and providing modern new homes for their customers. Home Group has a proven track record in carrying out ambitious regeneration programmes of various social housing estates around the country, most recently at the Rayners Lane estate in Harrow; Olympic Way, High Wycombe and South Oxhey, Watford. As a social enterprise and charity all surplus made by their outright sales activity is reinvested in affordable homes and communities.

1.3 Home Group are the freehold owners of Concorde Close, which currently comprises 43 affordable homes in social and affordable rents. Concorde Close is located to the east of Lampton Road within LB Hounslow, approximately 500 ft from Hounslow Central tube station. The Site is laid out in an L-shaped format and comprises two 3-storey residential blocks containing a mix of maisonettes and flats. There are also three blocks of single storey garages, and one single garage located to the rear of the residential blocks. Despite an ongoing maintenance programme, the estate has fallen into a state of disrepair due to its dated construction and increasing number of anti-social issues.

1.4 Home Group are committed to providing homes their customers want to live in and seek to ensure that all customers have quality homes which promote social cohesion, wellbeing and self-dependence. Through this commitment they undertake periodic reviews of their existing housing stock to understand the nature of any shortfall in the quality of homes or their immediate environs and determine the options to address these shortfalls. In doing this, Home Group follows a detailed governance process to support the way it makes its decisions about its homes.

1.5 Home Group have undertaken a review of the issues raised by Concorde Close. Through this process, it has been identified that the problems at Concorde Close cannot be addressed through maintenance, the existing homes are dated, of poor design, encourage anti-social behaviour and do not meet the needs of residents. Significant investment would be required to address these concerns. Accordingly the regeneration of Concorde Close has been deemed to be the most appropriate, long term, sustainable solution to provide modern, high quality homes for the existing residents. As such Home Group wish to pursue an estate regeneration project.

Estate Regeneration

1.6 In accordance with the Mayor's Good Practice Guide for Estate Regeneration February 2018, Home Group have reviewed various options for improving the existing problems identified on the estate, including:

- Option 1: Maintain the estate and repair damages as and when they occur;
- Option 2: Redevelop only parts of the site;
- Option 3: Comprehensive renewal of the estate.

1.7 The full review of options is set out in the Case for Estate Regeneration and Affordable Housing Statement, submitted in support of the planning application. In summary, any approach other than comprehensive renewal would fail to address many of the inherent problems arising from the estate. Renewal was considered to provide the greatest benefits to existing customers and secure the provision of high quality replacement affordable homes in the long term.

Scheme Development

1.8 The proposals for the Site, the subject of this application, have been developed by Farrells since Summer 2017. Furthermore, the current proposals have been heavily influenced by its Concorde Close customers. Home Group started consultation with customers of Concorde Close in July 2017 and, following the decision to pursue comprehensive estate regeneration, has kept its customers at the heart of the consultation programme. Feedback received has informed the design of proposals throughout the process and strongly influenced the final design for Concorde Close.

- 1.9 An initial preview for customers, and focussed consultation event for Neighbours, as well as two wider Public Exhibitions have been held in September 2018. A programme of pre-application meetings have taken place with LPA Officers to discuss design, bulk and massing, highways, daylight/sunlight, and landscaping. In addition, a number of meetings have been held with Ward Councillors to keep them updated as to how the proposals are progressing. The scheme was also subject to Pre Development Presentation to Members on 20 September 2018. The team presented the scheme to Members, after which Members were invited to ask questions and raise any queries.
- 1.10 The central aim of the proposals is to re-provide high quality affordable housing. The current development is no longer fit for purpose and is suffering from substantial anti-social behaviour issues. To improve the current estate would require significant investment that would be better spent on comprehensive redevelopment. The proposals succeed in re-providing the equivalent level of affordable floorspace, whilst securing an uplift of 27% affordable floorspace across the development, thereby ensuring that all units meet the national space standards. The scheme also provides much need market housing, new amenity space and parking, as well as improving the overall aesthetic of the Site.

2.0 APPLICATION SITE AND SURROUNDINGS

- 2.1 The Site is located to the east of Lampton Road within the London Borough of Hounslow ('LB Hounslow'). The Site currently comprises 43 dwellings, including 3 x 1Bed bedsits, 26 x 2Bed flats and 14 x 2Bed maisonettes, and is managed by Home Group as a mix of social and affordable rent homes. The existing residential buildings on site are set out in a broadly L shaped configuration and reach three storeys in height. There are three single storey garage blocks located to the rear of the residential buildings; surface level car parking is also provided throughout the Site.
- 2.2 The Site is accessed from Lampton Road and currently contains 12no. on-street surface parking spaces, residents parking for a further 36no. vehicles is provided within the garages located to the north and east of the Site. It is understood that the majority of residents use their garages for other purposes than parking due to their size.
- 2.3 The Site's eastern boundary sits adjacent to the back gardens of 2-storey residential properties which front Lampton Park Road. There is a line of mature trees and bushes which form a visual barrier between the Lampton Park Road gardens and current Concorde Close residential building. The south of the Site is bound by an exposed section of the Piccadilly line, part of the Site's western edge sits behind existing 2-storey properties, located on Lampton Road which comprise a Veterinary Surgery, Dentist Surgery and 2no. residential units. The north western corner of the Site faces directly onto Lampton Road. The north of the Site closely neighbours the side elevation of 3-storey 69 Lampton Road and residential gardens.
- 2.4 There are a number of 4-storey residential flatted buildings located within the vicinity of the Site, directly opposite the Site to the west are 2no. 4-storey residential buildings, and 1no. further 4-storey residential building is located further to the north of the Site which is accessed from Alexandra Road.
- 2.5 The Site is located to the north of Hounslow Town Centre, located on the opposite side of the Piccadilly line which acts as a visual barrier. Lampton Park is located to the west with the LB Hounslow Civic Centre further to the northwest.

- 2.6 The wider area is predominantly residential. Considerable levels of new residential development is coming forward around the Site, further intensifying the local residential character and housing supply. Specifically, Planning Permission has been granted for the redevelopment of the Civic Centre located on Lampton Road to the north west of the Site. The proposals began construction in 2016 to provide 940 new homes in residential blocks reaching a maximum of 9 storeys, by 2022. The proposals are starting to change the heights within the local area, creating new higher density residential character for the local vicinity.
- 2.7 Concorde Close is located within LB Hounslow's 'Town Centre North' Controlled Parking Zone (CPZ). The hours of controlled parking are: Monday – Friday: 9:30am to 6pm; Saturday: 9:30am to 12:30pm. The Site has a PTAL rating of 3 (moderate), although it is located some 500m from areas of PTAL 6 (excellent), the Site benefits from good transport links, it is in close proximity to Hounslow Central Underground Station, providing direct access to Central London. There are also a number of bus stops surrounding the Site.
- 2.8 Concorde Close is located within Flood Zone 1, as such the Site has a low probability of flooding.

3.0 PLANNING, CUSTOMER AND COMMUNITY ENGAGEMENT

3.1 The proposals have been subject to significant engagement with customers, Officers of LB Hounslow, Members and the local community.

Planning

3.2 The proposals have been subject to extensive pre-application discussions with Officers of LB Hounslow. In August 2017, the Applicant sought to engage with Officers in a structured manner and entered into a Planning Performance Agreement with LB Hounslow, this provided for the following four meetings:

- PPA Meeting 1 – 20 September 2017;
- PPA Meeting 2 – 24 May 2018;
- PPA Meeting 3 – 4 July 2018; and
- PPA Meeting 4 – 1 August 2018.

3.3 The PPA was on the basis of a proposal for estate regeneration of Concorde Close through demolition and redevelopment to provide a mix of 1,2,3 and 4 bedroom units comprising re-provision of existing affordable floorspace, new affordable units (subject to viability testing) and market sale units.

3.4 At PPA1 the Team set out the case for estate regeneration, seeking to agree the policy basis as well as setting out the engagement undertaken to date. The Team tested the possible approaches to massing and scale on the Site to secure the necessary re-provision of floorspace and additional market units to fund the proposals in part. Discussion was also had over the potential opportunity for land assembly with the properties located on the Site's western boundary, adjacent to Lampton Road. As a result, a scheme seeking to provide a mix of houses and flats with heights up to 12 storeys and up to 160 units was presented. As per Officers written response, dated 2 October 2017 (attached at Appendix 1), Officers advised that whilst they supported the aspirations for estate regeneration, a reduction in the proposals was required to enable Officers to support the scheme in relation to scale, height, bulk and mass. Further work was needed in order to understand the baseline scheme in terms of viability, in short, what is the minimum level of private sale accommodation required to cross subsidise and achieve the estate regeneration policy of replacement affordable floorspace to a better standard.

3.5 Through PPA2, the Applicant confirmed that the team had tested multiple scheme iterations, not just in terms of viability, but also how the resultant quantum of development can be sensitively achieved on site whilst having regard to the character of the area and creating a good relationship with surrounding properties. Officers noted that the scheme represented a considerable improvement from that presented at PPA1. Concerns were raised over the 'pinch point' between the new proposals and Lampton Park Road, and the number of single aspect units, distance between Core 1 and 69 Lampton Road, external tree design of stair core, bin store locations, and use of shared ownership tenures.

3.6 During PPA3, the Team responded to the points identified at PPA2, as set out in Officers written response dated 25 July 2018 (copy attached at Appendix 2), the following points were agreed:

- Height and massing: Redistribution of massing across the Site – The proposals were amended to include stepped back features on Core 1 to reduce the visual impact and remove potential 'pinch points' with existing 69 Lampton Road; whilst avoiding the loss of any units.
- Review of provision of dual aspect units – The internal layout of the scheme was reworked to increase the provision of dual aspect units from 36 (29%) to 74 dual aspect units (60%), resulting in a significant 41% increase in dual aspect units. Officers accepted this provision.
- Location of family module units – The number of dual aspect family units increased from 3 units to 9 units out of 12, resulting in a 63% increase in the number of dual aspect family units without impacting on access for residents and the bike store. This option also provided large back gardens for 4 units at ground floor and retains the 4 bed layout favoured by existing customers. Officers accepted this provision.
- Design development of the ground floor – A number of amendments were made in response to Officers comments regarding the GF layout:
 - Bin store integrated within the fabric of Core 1. It was agreed that the benefits provided from the new location, including creating an additional dual aspect unit, outweighed the potential harm caused by exceeding the drag distance from Core 3.

- A recess at the stair core of Core 1 was introduced to increase the distance between 69 Lampton Road and the proposals to 6.7m.
- An assessment was undertaken to understand whether submerging the plant room, as per Officers suggestion, would be possible. The Quantity Surveyor confirmed that, due to the size of plant room required, submerging it would have an additional negative impact on the cost plan and this would not be a viable option to pursue. Plant rooms were located to the rear of Core 2 instead, removing the most constrained flat and providing active frontages within Core 1. This was accepted.
- The proposals included a considerable number of Sheffield bike stands within Core 1 as requested.
- A substation with close proximity to Lampton Road is required, this was included at the entrance to the Site. It was designed as a Guardian House, to create a welcoming point of arrival and discourage anti-social behaviour. Officers did not support the location of the substation and requested that work was undertaken to relocate it or incorporate it within another use or built form on the Site.
- Alternative designs for the stair core. – Alternative ideas for a more linear design were presented to Officers. It was agreed to retain the linear tree design.

3.7 During the final PPA4 meeting, the Team sought to discuss the remaining issues and provided initial landscaping details and daylight and sunlight information. In terms of landscaping and daylight and sunlight, it was agreed that the information viewed to date was acceptable but would be reviewed further as part of the application documents. The Architects advised that the latest massing would comprise increasing the height at the centre of Core 1, and the sub-station location was presented, based on detailed design work and advice received from SSE. It was agreed that the proposed ground floor changes and substation were acceptable. The remaining issues were set out as:

- 1) Core 1 Lampton Road elevation - Officers didn't consider that this read as a main frontage and should have a better presence.
- 2) Impact of Core 1 on 69 Lampton Road. Officers considered that selected balconies were too overbearing and could result in significant overlooking on the existing window.

- 3.8 Additional information was submitted to Officers following PPA4 via email, which utilised a new internal layout for Core 1 to reduce overlooking on 65 Lampton Road it included recessed balconies. A new design for Core 1 Lampton Road elevation was submitted also. Officers agreed that this information responded to their concerns.
- 3.9 A full review of design development is set out in the Design and Access Statement.

Customer

- 3.10 Home Group has undertaken significant pre-application engagement with customers, LBH Officers and Ward Councillors. Home Group has put customers of Concorde Close at the heart of the consultation programme and used feedback received to inform the design of proposals throughout the process. Full details of consultation carried out to date is set out in the submitted Statement of Community Involvement. In summary, Home Group has held the following consultation programme for customers:

- Four information sessions to introduce the proposals in July and October 2017;
- Six design workshops including two aimed at the younger customers of Concorde Close;
- Two site visits to another Home Group regeneration project; and
- Monthly coffee mornings since February 2018.

- 3.11 The above sessions were attended by 35 households in total, with many attending on several occasions. The feedback received has been fundamental in shaping the current proposals as it has determined the mix and tenure, and helped to provide guidance on materials, site layout and car parking.

- 3.12 A customer preview consultation event took place on 3 September 2018 to enable customers to review the latest proposals and provide their initial thoughts prior to wider public consultation taking place.

Member

- 3.13 Meetings have also been held with Ward Councillors (Cllrs A Grewal, P Grewal and Malik) to keep them updated on the progress of the scheme and provide an overview of the engagement undertaken to date.

3.14 The scheme was presented to Members at Pre-committee Presentation on 20 September 2018. Home Group introduced the organisation and their motivations and objectives for the scheme. Farrells then presented the latest the proposals to Members, who were subsequently invited to ask questions. Key questions focussed on neighbouring amenity, trees, height and parking.

Community consultation

3.15 Lastly, a number of community consultation events have also taken place in September, as follows:

- Consultation event for Neighbours – 6 September
- Public exhibition – 13 and 15 September

3.16 Full details of consultation undertaken, the comments received, and how the scheme has evolved in response is set out in the submitted Statement of Community Involvement, prepared by Field, and Design and Access Statement, prepared by Farrells.

4.0 THE PROPOSED DEVELOPMENT

4.1 Full Planning Permission is sought for the demolition of the existing three storey buildings comprising 43 C3 Use flats and maisonettes, with a number of single-storey garages to the rear. As well as the erection of two build blocks comprising 124 C3 Use dwellings.

4.2 The full description of development is:

Demolition of existing Concorde Close, and redevelopment to provide two new build blocks comprising up to 6 storeys in height, comprising 124 Class C3 dwelling houses. Creation of new play space, landscaping, and associated residential car parking (including disabled), cycle parking, access and servicing.

4.3 The proposals can be summarised as:

- Demolition of existing three storey C3 Use dwellings and single-storey garages on the Site.

Housing

- Construction of new two build blocks in a broadly L shaped layout comprising two new building blocks. The block to the front of the Site comprises part 5 storeys at the front and rear, stepping up to 6 storeys in the centre of the block. The block to the rear comprises 4 storeys to the north and south, it steps up to 5 storeys and then 6 storeys in the centre.
- The two buildings comprise 4 new residential blocks, focussed around 3 Cores as follows:
 - Core 1: Comprises Block A. Located in the north west of the Site and fronting Lampton Road. Access to upper levels is provided via stair core 1.
 - Core 2: Comprises Block B and ground floor, first floor and second floor of Block C. Ground floor units benefit from direct street level access. Access to upper levels is provided via the stair core which connects Block B to Block C.
 - Core 3: Comprises third floor, fourth floor, fifth floor and sixth floor of Block C and Block D. Ground floor units benefit from direct street level access. Access to upper levels is provided via the core which connects Block C and D.

- Total of 124 C3 Use residential dwellings consisting of 1, 2, 3 and 4 beds are proposed, comprising 50 affordable units and 74 market units.
- Of the affordable housing provision, 43 affordable units are proposed to re-provide the existing units on site, plus one additional unit to meet current housing need on site in response to the Housing Verification Forms received from Customers. This equates to 44 units in total of these 12 units are affordable rent and 32 units are social rent. An additional 6 shared ownership units will be provided. As a whole the scheme provides a total of 40% affordable housing provision.
- For completeness the following mix and tenure is proposed:

Mix	1b2p	2b3p	2b4p	3b4p	3b5p	3b6p	4b7p	TOTAL
Core 1	13	6	24	0	0	0	0	43
Core 2	15	4	18	0	0	0	0	37
Core 3	10	4	16	4	6	1	3	44
TOTAL	38	14	58	4	6	1	3	124

Tenure	1b2p	2b3p	2b4p	3b4p	3b5p	3b6p	4b7p	TOTAL
Market	26	10	38	0	0	0	0	74
Affordable Rent	1	4	3	0	3	0	1	12
Social Rent	9	0	13	4	3	1	2	32
Intermediate (Shared Ownership)	2	0	4	0	0	0	0	6
TOTAL	38	14	58	4	6	1	3	124

Amenity

- All units will meet minimum internal space standards as set out in the Nationally Described Space Standards.
- 2,030 sqm of private amenity space is proposed in the form of private gardens, balconies and private terraces as follows:

Private Amenity	Area (sqm)
Private Gardens	708
Balconies	669
Private Terraces	653
TOTAL	2,030

- 1,078 sqm of communal amenity space is proposed for use by residents, including 320 sqm of dedicated child's play space at ground level. For completeness the following provision is proposed:

Communal Amenity	Area (sqm)
Ground Floor Child Play	320
Core 1 Communal Roof Terrace	164
Core 2 Communal Roof Terrace	297
Core 3 Communal Roof Terrace	297
TOTAL	1,078

Parking

- Five secure cycle sheds are proposed to provide parking spaces for 210 cycles for residents. 2 cycle sheds will be integrated into Core 2, one will be located adjacent to Core 1, Core 3 and next to the south site boundary.
- 8 additional cycle spaces are proposed for visitors.
- Provision of 22 car parking spaces (including 5 disabled spaces) for use by existing residents only. The development is proposed to be car-free otherwise, to be controlled by way of an obligation restricting residents from applying for a parking permit within the adjoining Controlled Parking Zone (CPZ).
- Retention of the current access arrangements, amendments to modernise the layout.

Landscaping and Ground Floor Changes

- Creation of a new ground floor external landscaped area for use for community events.
- High quality landscaping is proposed throughout the Site to create private, defensible space for residents.
- Provision of public footpath through the Site for pedestrian use.
- Retention of 21 trees on site, removal of 23 trees, the majority of which are category C trees or lower. One Category B- tree is to be lost due to its location within the proposed new building outline.
- Introduction of 6 new trees to the Site boundary to respond to engagement with neighbours.
- Provision of a new substation to meet energy demand is proposed on the south west edge of the Site.
- Integrated bin store located within Core 1.

5.0 PLANNING POLICY CONTEXT

5.1 This section of the Statement summarises the relevant planning context within which the Proposed Development has been prepared and against which the proposals will be considered.

The Development Plan

5.2 Section 38 of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise. LB Hounslow's Development Plan comprises the London Plan (2016, consolidated with amendments since 2011) and the Hounslow Local Plan (2015).

5.3 Material to the consideration of this application is the National Planning Policy Framework (July 2018) and Planning Practice Guidance which provide national planning policy guidance along with Mayoral and local Supplementary Planning Guidance/Documents (SPG/SPD). Namely the Mayor's London Housing SPG (2017), the Mayor's Homes for Londoners SPG (2017) and the Mayor's Good Practice Guide to Estate Regeneration: Better Homes for Local People (2018).

Policy Designations

5.4 In terms of designations, these are set out within LB Hounslow's adopted interactive Local Plan Policies Map and confirms that there are no designations on the Site.

5.5 The following designations are in close proximity to the Site and as such have been considered in the preparation of the development proposals:

- Site of Important Nature Conservation (SINC) and Local Open Space to the west.
- Site of Important Nature Conservation (SINC) – Piccadilly Line Railsides (immediately to the south of the Site).
- Hounslow Town Centre Boundary (to the south of the Piccadilly Line; approximately 120 metres to the south of the Site).

5.6 Having regard to the Environment Agency Flood Maps, the Site falls within Flood Zone 1.

LB Hounslow Local Plan 2015-2030 (September 2015)

- 5.7 The Local Plan was adopted in September 2015 and sets out the vision for development within LB Hounslow for the next 15 years to 2030.
- 5.8 The Local Plan splits the Borough into 10 districts, and the Site is located within the Hounslow District. The Local Plan sets out the spatial strategy for Hounslow (pages 46 – 47) and states that it is envisaged that Hounslow will benefit from significant growth focussed on brownfield sites in and around the High Street (paragraph 2.59). Over 3,000 new homes are to be delivered in Hounslow over the plan period that offer ‘contemporary town centre living in a range of house types and tenures’ (paragraph 2.62(3)). The Local Plan also aims to enhance ‘the compact, lower rise, family housing character of surrounding residential communities that lie to the north and south of the high street’ (paragraph 2.62(6)).
- 5.9 The key growth and housing policies relevant to the proposed development are:
- Policy SC1 Housing Growth – Requires a minimum of 12,330 new homes to be provided across the Borough over the Plan period with over 3,000 in Hounslow, the majority envisaged to come from allocated sites (see Table SC1.1).
 - Policy SC2 Maximising the Provision of Affordable Housing – Seeks the maximum reasonable amount of affordable with a strategic target of 40% of new homes to be provided as affordable at a tenure split of 60% affordable/social rent and 40% intermediate.
 - Policy SC3 Meeting the Need for a Mix of Housing Size and Type – States the LPA will promote and support appropriate specialist housing to meet specific affordable housing needs. Policy seeks to secure a mix of new housing type, size and tenure across the borough to meet objectively assessed and evidenced local housing need. The starting point is based on the latest and/or most specific available evidence, applying the general housing need mix requirements as set out in the following table:

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

- Policy SC4 Scale and Density of New Housing Development – To optimise housing output having regard to London Plan density ranges, site context and character, design and PTAL on a case by case basis. The LPA will have regard to density ranges contained in the London Plan Policy 3.4 to help guide the design and scale of new housing developments. Nevertheless where opportunities to maximise housing densities at suitable larger sites in areas of good public transport accessibility exist or can be created, they should be explored where all other planning policies can be fully satisfied to achieve sustainable development.
- Policy SC5 Ensuring Suitable Internal and External Space – Ensure that new housing development meets minimum space standards as set out in the Nationally Described Space Standards. Demonstrate how the benchmark external space standards as per Figure SC5.2 (summarised below) have been considered and be in accordance with the London Plan requirements.

Dwelling Type	Minimum External Amenity Area	Communal Amenity
Houses		
Three habitable rooms	50 sq.m	
Four habitable rooms	60 sq.m	
Five habitable rooms and over	75 sq.m	
Flats		
1-2 Bed	5 sq.m with an additional 1 sq.m for each additional occupant, i.e. useable balconies, roof terraces, private garden space.	Calculated for each flat less a reduction for the area of private space provided for each flat
Up to three habitable rooms		25 sq.m
Four habitable rooms		30 sq.m
Five habitable rooms		40 sq.m

5.10 In addition to the above, the key policies relevant to the proposed development are as follows:

Design

- Policy CC1 Context and Character
- Policy CC2 Urban Design and Architecture

Green and Blue Infrastructure

- Policy GB7 Biodiversity
- Policy GB9 Play space, outdoor sports facilities and burial space

Environmental Quality

- Policy EQ1 Energy and Carbon Reduction
- Policy EQ2 Sustainable Design and Construction
- Policy EQ4 Air Quality
- Policy EQ5 Noise
- Policy EQ6 Lighting
- Policy EQ7 Sustainable Waste Management
- Policy EQ8 Contamination

Enhancing Connectivity

- Policy EC2 Development a Sustainable Local Transport Network

Implementing the Strategy

- Policy IMP1 Sustainable Development
- Policy IMP3 Implementing and Monitoring the Local Plan

London Plan (March 2016)

5.11 The London Plan has been consolidated with alterations since 2011 and was most recently updated in March 2016. The Plan sets out the Mayor's strategic plan and an integrated social, economic and environmental framework for the development of London over the next 20-25 years.

5.12 The key planning policies of the London Plan relevant to the proposed redevelopment are:

London's People

- Policy 3.2 Improving Health and Addressing Health Inequalities
- Policy 3.3 Increasing Housing Supply – The minimum housing delivery for Hounslow is 822 dwellings per annum.
- Policy 3.4 Optimising Housing Potential – For sites with a PTAL of 2 to 3 the Density Matrix (London Plan Table 3.2) advises the following:

Setting	PTAL 2 to 3
Suburban	150-250 hr/ha
3.8-4.6 hr/unit	35-65 u/ha
3.1-3.7 hr/unit	40-80 u/ha
2.7-3.0 hr/unit	50-95 u/ha
Urban	200-450 hr/ha
3.8-4.6 hr/unit	45-120 u/ha
3.1-3.7 hr/unit	55-145 u/ha
2.7-3.0 hr/unit	70-170 u/ha

- Policy 3.5 Quality and Design of Housing Developments - sets out minimum internal spaces standards at Table 3.3 as confirmed below:

Number of bedrooms	Number of bed spaces	Minimum GIA (sqm)		Built in storage (sqm)
		1 storey dwellings	2 storey dwellings	
1b	1p	39 (37)*		1.0
	2p	50	58	1.5
2b	3p	61	70	2.0
	4p	70	179	
3b	4p	74	84	2.5
	5p	86	93	
	6p	95	102	
4b	5p	90	97	3.0
	6p	99	106	
	7p	108	115	
	8p	117	124	
* Where a one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m2 to 37m2, as shown bracketed.				

- Policy 3.6 Children and Young People's Play and Informal Recreation Facilities - Housing proposals should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.
- Policy 3.8 Housing Choice – Seeks provision of homes of different sizes, types and tenures.
- Policy 3.9 Mixed and Balanced Communities – Promotes mixed and balanced communities by tenure and household incomes across London.
- Policy 3.10 Definition of Affordable Housing – Sets out that Affordable housing is social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market.
- Policy 3.11 Affordable Housing Targets – Confirms that the Mayor is seeking at least 17,000 more affordable homes each year at a tenure split of 60% social/affordable rent and 40% intermediate tenure.
- Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes – The Mayor seeks provision of the maximum reasonable amount of affordable housing having regard to a range of factors such as the need to promote mixed and balanced communities and local need.
- Policy 3.14 Existing Housing – The loss of housing, including affordable housing, is resisted unless replaced at existing or higher densities with at least equivalent floorspace

London's Response to Climate Change

- Policy 5.2 Minimising carbon dioxide emissions
- Policy 5.3 Sustainable design and construction
- Policy 5.5 Decentralised energy networks
- Policy 5.6 Decentralised energy in development proposals
- Policy 5.7 Renewable energy
- Policy 5.8 Innovative Energy Technologies
- Policy 5.9 Overheating and cooling
- Policy 5.10 Urban greening
- Policy 5.11 Green roofs and development site environs
- Policy 5.13 Sustainable Drainage
- Policy 5.14 Water Quality and Wastewater Infrastructure
- Policy 5.15 Water Use and Supplies
- Policy 5.21 Contaminated Land

London's Transport

- Policy 6.3 Assessing Effects of Development on Transport Capacity
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.13 Parking

London's Living Spaces and Places

- Policy 7.1 Lifetime Neighbourhoods
- Policy 7.2 An Inclusive Environment
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.5 Public realm
- Policy 7.6 Architecture
- Policy 7.14 Improving air quality
- Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- Policy 7.19 Biodiversity and access to nature
- Policy 7.21 Trees and woodland

Draft New London Plan showing Minor Suggested Changes (August 2018)

5.13 The Mayor published a draft New London Plan in December 2017, which was subject to consultation until March 2018. The latest Draft New London Plan showing Minor Suggested Changes (13 August 2018), includes clarifications, corrections and factual updates to the Consultation Draft Plan that will help inform the Examination in Public. The new London Plan is due to be adopted in 2019. Whilst it is in draft, and little weight should be given to it, it is worth noting that it contains the following draft policy in relation to estate regeneration:

- Policy H10 Redevelopment of existing housing and estate regeneration, which states:
 - a. Loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Loss of hostels, staff accommodation, and shared and supported accommodation

that meet an identified housing need, should be satisfactorily re-provided to an equivalent or better standard.

- b. Loss of existing affordable housing should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace on an identical or equivalent basis. All such schemes are required to follow the Viability Tested Route and should produce an uplift in affordable housing provision where viable.

National Planning Policy Framework

5.14 The National Planning Policy Framework ('NPPF') sets out national planning policy and is a material consideration in the determination of planning applications. The Framework introduces a presumption in favour of sustainable development as the golden thread running through plan-making and decision-taking (para 14). Paragraph 7 sets out the three dimensions to sustainable development; namely economic, social and environmental roles.

5.15 The sections of the NPPF particularly relevant to the proposals are:

- Section 5: Delivering a sufficient supply of homes (paras 59 - 76)
- Section 8: Promoting healthy and safe communities (paras 91 - 101)
- Section 9: Promoting sustainable transport (paras 102- 111)
- Section 11: Making effective use of land (paras 117- 123)
- Section 12: Achieving well-designed places (paras 124-132)
- Section 14: Meeting the challenge of climate change, flooding and coastal change (paras 148 - 165)

5.16 Section 8, paragraph 93 expressly states that through policies and decisions Local Planning Authorities should consider the social, economic and environmental benefits of estate regeneration. Further LPA's should use their planning powers to help deliver estate regeneration to a high standard.

National Planning Practice Guidance (March 2014)

- 5.17 The National Planning Practice Guidance (PPG) was published in March 2014 to reflect and support the NPPF.

London Housing Supplementary Planning Guidance (March 2016)

- 5.18 The London Housing Supplementary Planning Guidance ('SPG') was updated in March 2016 to reflect the alterations to the main London Plan. This SPG is a material consideration in determining planning applications in London that include residential floorspace and provides specific guidance on estate regeneration proposals (p 5.1.13 to 5.1.18). The Housing SPG builds on the provisions of the London Plan and specifically seeks the maximum reasonable amount of affordable housing within developments (Policy 3.12). Where redevelopment of affordable housing is proposed, it should only be permitted where it is replaced by better quality accommodation, providing equivalent affordable floorspace at least (paragraph 5.1.13).
- 5.19 The SPG recognises that development at an increased density may be required to generate sufficient value from a market development to support replacement of affordable housing.

Mayor of London – Homes for Londoners Affordable Housing and Viability SPG 2017 (August 2017)

- 5.20 The SPG focuses on affordable housing and viability. The Mayor is committed to a long term strategic aim of half of all new homes in London being affordable, as such the main aim of the SPG is to increase the number of affordable homes delivered through the planning system.
- 5.21 The SPG sets out the threshold approach to viability, where the approach to viability information differs depending on the level of affordable housing being provided:
- 5.22 **Fast Track Route** – Applications that meet or exceed 35% affordable housing provision without public subsidy, provide affordable housing on-site, meet the specified tenure mix, and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information. Such schemes will be subject to early viability review, if an agreed level of progress is not made within two years of planning permission being granted, or within a timeframe agreed by the LPA.

- 5.23 **Viability Tested Route** – Schemes which do not meet the 35% threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised by the LPA and treated transparently. Where the LPA determines that a greater level of affordable housing could viably be supported, a higher level of affordable housing will be required which may exceed the 35% threshold.
- 5.24 The SPG states estate regeneration schemes which involve the demolition of existing affordable housing, are only suitable for the Viability Tested Route. This is due to the need to have viability information to assess the application (paragraph 2.9) and the re-provision of the existing affordable floorspace on a like-for-like basis and maximise additional affordable housing (paragraph 2.67).
- 5.25 In addition, early and late viability reviews will be applied to all schemes that do not meet the threshold in order to ensure that affordable housing contributions are increased if viability improves over time. In all cases applicants should determine whether grant and other forms of subsidy are available to increase the level of affordable housing delivered.
- 5.26 Further, the SPG sets out detailed guidance on viability assessments, aiming to establish a standardised approach.
- 5.27 This SPG supersedes Part 4 (Affordable Housing – Viability Appraisals) of the London Housing SPG (March 2016). The rest of that SPG remains current.

Better Homes for Local People – the Mayor’s Good Practice Guide to Estate Regeneration (February 2018)

- 5.28 The Mayor’s Guide is a material consideration in determining estate regeneration planning applications and should be consulted to when approaching an estate regeneration scheme and referred to throughout the pre-planning stage.
- 5.29 The Guide sets out the Mayor’s overarching objectives for any estate regeneration schemes (ch. 2), whilst confirming the requirement for a full and transparent consultation process for existing residents. It confirms that the successful engagement should include direct proactive engagement of a wide group of residents; involvement of residents in developing the detail of proposals; and broader opportunities for residents to be kept updated and engaged.

5.30 The Guide sets out the 'Better Homes for Local People' principles for those estate regeneration schemes in London that involve the demolition of existing homes (ch.4), and confirms that these schemes should provide:

- An increase in affordable housing;
- Full rights to return for social tenants; and
- A fair deal for leaseholders and freeholders.

5.31 The Guide builds on the London Housing SPG and recognises that LPA's should look to increase the number of affordable homes as part of estate regeneration schemes by building at higher densities wherever possible. It also recognises that further increasing the density of an estate may improve the viability of a scheme and help to maximise the number of genuinely affordable homes (p.16). Lastly, the Guide expects the delivery of additional affordable housing to be maximised, and for that reason all schemes should follow the Viability Tested Route to planning permission (p.22).

6.0 CASE FOR DEVELOPMENT

6.1 The key matters raised in determining this application is as follows:

Matters of Principle

- Principle of Development - Has the principle of redeveloping the Site for residential use been established?
- Case for Estate Regeneration – Does the scheme meet the policy requirements for estate regeneration? Does the scheme reprovide the existing level of affordable floorspace? Do the new units meet the better quality test?
- Case for Affordable Housing – Does the proposed level of affordable housing provided against the new market units meet policy requirements?

Matters of Detail

6.2 The following matters of detail are considered below:

- Scale, height, bulk and mass – Is the proposed size of the development suitable for the Site and in keeping with the local context? Does it constitute high quality design?
- Density – Is the size of the development suitable for the PTAL and suitable for the local context?
- Neighbouring Amenity – Will the proposals result in a loss of privacy to existing neighbouring residential development? How have the proposals been designed to reduce their impact?

6.3 The following matters of detail are also considered to understand how they comply with adopted planning policy:

- Internal Amenity
- Amenity and Open Space
- Play space
- Landscape
- Trees
- Transport and Highways
- Energy and Sustainability

- Air Quality
- Drainage
 - Noise
 - Lighting
 - Contamination
 - Biodiversity

Matters of Principle

Principle of Development

- 6.4 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan comprises the London Plan 2016 and the LBH Local Plan 2015.
- 6.5 The Government, Mayor of London and LB Hounslow place great importance on the need to optimise sites in order to provide high quality affordable homes for local people (see NPPF paragraph 20 (a), London Plan Policy 3.3, draft London Plan Policy H1, and local planning policy SC2).
- 6.6 In terms of principle of development, the Site benefits from an existing and established residential use. The new scheme seeks to retain the current use, by redeveloping the Site to provide a purely residential scheme which seeks to provide an increased quantum of housing. The proposals will reprovide 43no. existing affordable units and one additional unit to meet existing need, whilst providing 6no. additional intermediate units and 74no. market dwellings. Thereby the principle of development is established.

Case for Estate Regeneration

- 6.7 The key test for the planning application is ensuring that the scheme complies with the necessary policy requirements and Mayoral Guidance for estate regeneration schemes. The submitted Case for Estate Regeneration and Affordable Housing Statement (September 2018) sets out the how the scheme satisfies the principles of estate regeneration: through reprovision of at least the existing level of affordable floorspace within the same tenure and providing new homes which meet the better quality test. It also details how the mix has been established in response to identified need (London Plan

Policy 3.1, Affordable Housing SPG 2017 paragraph 2.66, Mayors SPG P2.66 and better Homes for Local People 4(II)). It is therefore not repeated herein.

Case for Affordable Housing

- 6.8 Local policy sets a strategic target for 40% of additional housing delivered across the borough to be affordable. Policy states that Officers will seek the maximum reasonable amount of affordable housing to be negotiated on a site by site basis with a capacity to provide ten or more homes, with reference to the 40% strategic borough wide target (Local Policy SC2).
- 6.9 Similarly, the Mayor's Adopted Affordable Housing SPG (2017) (para 2.9) states that for estate regeneration proposals, a maximum provision of affordable housing should be sought. Thereby the Mayor's Good Practice Guide states that the Mayor expects the delivery of additional affordable housing to be maximised, and via the 'Viability Tested Route' to planning permission.
- 6.10 Thereby as a starting position Officers will seek 40% affordable housing provision on the uplift of units, in excess of the 44 re-provided units, to be affordable. In order to assess the appropriate level of affordable housing the viability of the scheme has been assessed by BNP Paribas.
- 6.11 The proposed Development generates a negative residual land value of minus £4.67 million, reflective of the limited capacity for the existing Estate to be intensified significantly. Nevertheless, the scheme seeks to provide 6 additional shared ownership units.
- 6.12 The report concludes that in order to address the negative residential land value, private sales values will need to grow over the development period. Home Group is considered to be 'taking a leap of faith' in the capacity of the regeneration scheme in terms of values that cannot be evidenced by any local comparison currently. Furthermore, in the context of relatively lengthy development programme (due to the need to decant existing tenants), there is a significant risk of construction cost inflation, which the Applicant cannot control for. In this context, the provision of affordable housing exceeds the maximum reasonable level that can currently be provided.

- 6.13 Further, as the scheme is an estate regeneration. There is a minimum requirement to reprovide which requires at a minimum the re-provision of the current level of affordable floorspace. As the scheme successfully fulfils this requirement and provides the viability assessed level of additional affordable housing, it is considered to be policy compliant.
- 6.14 In regards to tenure of the new affordable housing, Local policy seeks 60% affordable/social rented and 40% intermediate tenures on all qualifying sites (Policy SC2). Whilst the scheme does not provide a policy compliant affordable tenure, in providing 100% intermediate tenure for the 6 additional units, it is considered to be an appropriate mix to sit alongside the affordable rent provision and seeks to encourage a more balanced mix of tenures across London (London Plan policy 3.9). It is also the maximum provision of affordable housing that the scheme can provide subject to viability.

Matters of Detail

- 6.15 The matters of detail are considered below:

Scale, Height, Bulk and Mass

- 6.16 The NPPF sets out overarching design guidance in achieving well-designed places in Section 12. The London Plan contains policy guidance relating to design, specifically Policy 7.4 Local Character, Policy 7.5 Public Realm and Policy 7.6 Architecture. The Local Plan provides policy guidance in the following Policy CC1 Context and Character and Policy CC2 Urban Design and Architecture.
- 6.17 The proposed scale, height, bulk and mass have been the subject of early and extensive testing with Officers of LB Hounslow through pre-application discussions (NPPF paragraph 128). They have been informed by a review of the existing and emerging character of the area and the opportunities presented by what is an underdeveloped site adjacent to Hounslow Central Underground Station. The development of the proposals has also had close regard to the requirements of estate regeneration policy to re-provide the existing level of affordable floorspace to a higher quality, and the London Plan internal space standards. As well as the providing a sufficient level of market housing to fund the regeneration and the constrained nature of the Site.

- 6.18 In line with estate regeneration guidance, the design has been subject to early and comprehensive engagement with customers to understand the existing problems on site that need to be resolved and what residents would like to see in the new scheme, whilst ensuring that the proposals meet the assessed housing needs. The submitted Design and Access Statement sets out the design evolution that the scheme has undergone.
- 6.19 In terms of height Officers advised during early pre-application discussions that six storey development would be the maximum suitable parameters for the proposals in this location (as confirmed in Officers written response at Appendix 1). It is considered that the height relates well to the existing surrounding development, and forthcoming new Civic Centre development which is currently under construction.
- 6.20 The proposal seeks to reduce the bulk of the buildings through the use of lighter materials, and setting back the top two floors to reduce visual impact. The use of set back stair cores also helps to streamline the development visually both in terms of the frontage to Lampton Road and the relationship to existing residential neighbours to the rear at Lampton Park Road (considered further below).
- 6.21 The overall design of the scheme has been developed in response to the design recommendations for the Hounslow character area as set out in the LPA's Urban Context and Character Study. The Site is identified as an area for enhancement, an area which has a medium quality, mixed character and which could benefit from sensitive improvement and intervention. The Site sits within the Type 2: Loose Grid area where the built form is dominated by large, irregular blocks with closes and cul-de-sacs forming a loose grid structure, as such this urban form and layout has been successfully carried through in the proposals and has been used to resolve issues of form, layout and structure within the existing estate.
- 6.22 At detailed level the proposals have been designed to respond to the wider context and history of the area, drawing on the historic Vickers Vimy in the overall design. Work has been undertaken to ensure the scheme accords with the natural landscape, incorporating high quality landscape features in the proposals, whilst preserving those key existing features, such as retaining the Category A Lime Tree on site.

- 6.23 Lastly, the proposals seek to resolve the existing anti-social issues which have resulted from the current design, it has removed the dark corners and open access to the Site by creating a layout with better natural surveillance and introducing fob access. This will have a positive impact on the amenity of current and future residents and help to create a Lifetime Neighbourhood. As such the proposals accord with Mayoral Policies 7.4, 7.5 and 7.6, and Local Policies CC1 and CC2.

Density

- 6.24 The London Plan seeks to optimise sites for housing having regard to local context, design principles and public transport accessibility (policy 3.4). The Draft New London Plan is moving away from density ranges as the test for what is an appropriate level of built form on the Site, and with a local policy preference for optimising the redevelopment potential of sites in close proximity to public transport and town centres (Local Policy SC4).
- 6.25 Whilst density ranges currently form part of the London Plan, Table 3.2 of the London Plan states that development on the Site could have a density of 200-450 hr/ha. The proposals result in a density of 662 hr/ha. Whilst this is above the policy recommendations, the Better Homes for Local People SPG recognises that LPA's should look to increase the number of affordable homes as part of estate regeneration schemes by building at higher densities wherever possible. The Mayor also states that increasing the density of an estate may improve the viability of a scheme and help to maximise the number of genuinely affordable homes. (Better Homes for Local People SPG -page 16).
- 6.26 In terms of units per hectare, Officer's written pre-application response (Appendix 1) advised that the Site is considered to be an urban location with a PTAL 3 which constitutes a density of up to 260 units per hectare in line with the London Plan's density matrix. The proposed scheme, with 124 units on a site area of 0.53 equates to a density of 233 units per hectare. In this case the density is in line with London policy and advice received from Officers within their written pre-application response. Thereby the density is considered suitable.

Neighbouring Amenity

- 6.27 The relationship to neighbouring properties has been carefully considered and tested with Officers during the course of pre-application discussions. The matter to be considered is whether the proposed scheme results in a satisfactory relationship in terms of privacy and outlook within the dwelling and in terms of the use and enjoyment of the rear gardens.
- 6.28 Farrells has undertaken an exercise within the submitted Design and Access Statement which sets out the full details of the separation distances. The smallest distance is between the Site and 69 Lampton Road. 69 Lampton Road is considered to be a bad neighbour as it has been constructed very close to its southern boundary with Concorde Close's site boundary. Therefore the current distance between 69 Lampton Road and Concorde Close varies from 3.2-3.4m. The new proposals seek to increase the distance to 4.2m at the smallest point. The proposals have been specifically designed to increase the distance to 6.5m, where the proposals will be adjacent to existing windows, the Core 1 stair core has been located here to reduce overlooking and increase the distance as much as possible. The remaining distances from the proposals to surrounding neighbouring development are in excess of 15.9m, with the majority exceeding 20m. Whilst the LPA does not have an adopted standard in this respect, and whilst policy is moving away from such standards, the London Housing Design Guide section 5.1 states the following:

In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes. These are still useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density.

- 6.29 Overall, it is considered that the resultant separation distances remain appropriate for a London scheme and ensure appropriate levels of privacy for both existing neighbouring properties and residents of the new scheme.

- 6.30 Through the neighbourhood consultation event it is understood that neighbours were concerned about overlooking from balconies and the perception of scale and bulk from their gardens. As set out above, design techniques have been utilised at an early stage in the design to minimise impact on outlook from the existing neighbouring properties, these include stepping back the top two floors of the rear building block to increase the distance and improve outlook on reduced bulk. It is proposed that suitable balcony materials will be used to further assist. Whilst introduction of tall growing trees at specific points have been introduced on the eastern and western site boundaries to improve screening. The conceptual details of the proposed planting are set out in the submitted conceptual Landscape Masterplan drawings and Landscape chapter of the Design and Access Statement, prepared by LDA Design.
- 6.31 The planning application is also accompanied by a Daylight and Sunlight and Overshadowing Report prepared by Malcolm Hollis which has undertaken a comprehensive assessment of the impact of the proposals on the neighbouring development. Please refer to the full report for the comprehensive findings. In summary the report states that:

Daylight – Neighbouring Development

- 6.32 146 windows of surrounding buildings have been assessed. Concerning VSC assessments, of the 146 windows assessed, 106 (73%) satisfy the BRE guide's criteria for adequate VSC. Five of the 14 buildings assessed (77%) achieve full compliance with the BRE guide's criteria for adequate VSC. Non-compliant windows are distributed among the remaining nine properties. Suitable mitigation is provided to account for the shortfalls. Further, the BRE guide recognises that, in some urban settings, existing buildings will already be enjoying significantly lower VSC values than the recommended target. This is true of mews dwellings where VSC values might be as low as 18%. If a reduced target threshold for VSC is selected, but the allowable change stays at 0.8 times the former value, the degree of compliance achieved improves.
- 6.33 Concerning the distribution of daylight in rooms, 68 rooms have been assessed, 36 (53%) of which satisfy the BRE criteria for daylight distribution. Suitable mitigation is provided to explain the shortfall, the majority of reductions in light distribution affect Lampton Park Road properties. It should be noted that currently the rooms in the Lampton Park Road properties enjoy very good levels of light distribution, in a lot of cases, over the entire area of the room concerned. When rooms in adjoining properties start with such high levels of light distribution, reductions greater than the recommended 0.8 times will need to be accepted if adjoining land is to be developed to its fullest potential. Many of

the rooms, although experiencing reduction in distribution in excess of 0.8 times, the former value will still enjoy direct skylight over more than half of their area.

Sunlight– Neighbouring Development

- 6.34 Only two buildings assessed do not achieve full compliance with the BRE guide's recommendations; 23 Lampton Park Road and 69 Lampton Road. It should be noted that 12 (out of 13) of the windows that are unable to attain the required sunlight amenity, serve the building at 69 Lampton Road. This adjoining building sits very close to its boundary with the application site; as such it is a "bad neighbour" building. The proposed building will sit further away from 69 Lampton Road than does the existing building on the application site benefitting 69 Lampton Road. Subsequently, the windows assessed will continue to enjoy exposure to some sunlight over the year.

Overshadowing – Neighbouring Development

- 6.35 The report concludes that a high degree of compliance is achieved by the proposed development in relation to preservation of sunlight to open amenity spaces of adjoining properties.
- 6.36 In overall terms the proposed development attains a relatively high degree of compliance with the recommended criteria for the preservations of daylight and sunlight amenity to surrounding properties and open amenity areas.

Internal Amenity

- 6.37 The submitted Daylight, Sunlight and Overshadowing Report, prepared by Malcolm Hollis also includes an assessment of the proposed scheme, in summary it finds that:

Daylight – Proposed Development

- 6.38 The rooms assessed represent a sample of units in Blocks A and Block B which interact with each other spatially in a way that Blocks C and D do not. The rooms comprised in the sample assessed are rooms providing bedroom accommodation and lounge/kitchen/dining areas in the proposed units.

- 6.39 Concerning the ADF results, of the 108 rooms assessed, 101 (94%) satisfy the BRE guide's criteria for adequate light amenity. Concerning daylight distribution, of the 108 rooms assessed, 94 (87%) satisfy the BRE guide's criteria for adequate light amenity. The 14 rooms that do not achieve the recommended distribution are a combination of bedrooms and lounge/kitchen/dining areas. These rooms still achieve distribution of light benefitting between 41% and 79%. The recommended distribution value is 80%.
- 6.40 The results of the daylight amenity study for the sample rooms indicate that, across the development, there is likely to be a high level of compliance with the recommendations of BRE guide.

Sunlight – Proposed Development

- 6.41 A total of 57 windows serving a total of 36 rooms in Blocks A and B required assessment. The results confirm that all 57 windows (100%) are expected to receive adequate levels of sunlight in the winter and annual periods. This should render the rooms they serve sunny in outlook and it is considered that the development proposed will enjoy very good levels of sunlight amenity.
- 6.42 Particular reference has been made to the north facing units within Core 1 that overlook 69 Lampton Road, specifically rooms R7, R8, R9 and R10 at ground, first, second and third floor levels. The report details the adequacy of daylight relating to these units. All rooms achieve good ADF values and all, but one has very good daylight distribution.

Amenity and Open Space

- 6.43 Local policy sets out that the external space standards should reflect the character of the Borough (Local Policy SC5). The Local Plan refers to provision of private and communal amenity space for flatted developments, whereby a minimum of 5 sq.m. of private outdoor space for a 1-2 person dwelling is required and an extra 1 sq.m should be provided for each additional occupant of that dwelling. The policy also states that no less than 25sq.m of communal external space should be provided for each flat up to three habitable rooms, 30sq.m for up to four habitable rooms and 40sq.m for each flat up to five habitable rooms.

6.44 The scheme achieves a total of 3,108sq.m of external space, distributed as follows:

- 320sq.m of child play space at ground floor;
- 164sq.m of communal amenity at the roof level of Core 1;
- 297sq.m of communal amenity at the roof level of Core 2;
- 297sq.m of communal amenity at the roof level of Core 3;
- 708sq.m of private gardens at ground floor;
- 653sq.m of private terraces/patios; and
- 669sq.m of private balconies.

6.45 The scheme requires a total of 795 sq.m private amenity space to be provided, the proposals greatly exceed this level by providing 2,030 sq.m of private external amenity space across the Site. The scheme has been designed to ensure that each unit has a policy compliant level of private amenity space, as set out in the submitted Schedule of Accommodation, prepared by Farrells (copy enclosed at Appendix 3). Private amenity spaces will feature private gardens with a patio sufficiently sized for table & chairs, artificial turf in small northfacing gardens, and natural lawn in the larger gardens. Ground floor amenity will utilise measures such as pin kerbs and rails submerged in soft landscape to ensure privacy and security.

6.46 In terms of communal amenity space, policy requires provision of 4,550 sq.m, less a reduction for the area of private space provided for each flat, this results in a requirement of 2,520 sq.m communal amenity space. As set out above the proposals provide 1,078 sq.m in the form of child play space, and roof terraces on Cores 1,2 and 3. This equates to a shortfall of 1,442 sq.m. The proposals have sought to maximise opportunities for communal provision where possible on the Site, resulting in a high quality, safe and secure communal space for use by residents.

6.47 Furthermore, the current estate provides no communal amenity space for residents to use, the current green space is very disjointed and lacks natural surveillance which has resulted in anti-social issues becoming a problem. The overall conceptual Landscape Masterplan has been developed to create a much needed common space for the enjoyment of existing and new residents alike and deliver a high quality piece of public realm which adds to the Green Infrastructure Network. The proposals include a new community green for all residents to utilise which benefits from natural surveillance and is a safe distance from Lampton Road. It will also include multiple landscape features such as planters, lawn, flowering multi stem trees to create natural break from the open space and residential buildings. The new provision represents both an increase on the

current quantity of space and will be a considerable improvement in quality. Further details of the proposed type of provision is set out in the Landscape chapter of the Design and Access Statement and submitted Conceptual Landscape Masterplan prepared by LDA Design.

- 6.48 Lastly, the Site benefits from close proximity to a large amount of communal open space, including Lampton Park (within 200m), Inwood Park (within 800m) and Hounslow Heath (within 2km) which residents can readily access.

Play space

- 6.49 The London Plan seeks provision for play space based on the expected child population generated by the scheme and an assessment of future needs (Policy 3.6). Using the Mayors methodology (Shaping Neighbourhoods: Play and Informal Recreation SPG 2012), the scheme is anticipated to generate 60 children comprising the following breakdown:

- Under 5 : 27 children
- 5 to 11 : 20 children
- 12 + : 13 children
- Total : 60 children

- 6.50 The London Plan requires a benchmark standard of 10 sqm per child, this sets a requirement of 595.3 sqm for the proposals. There is an expectation that provision of doorstep play for under 5's should be met on site. The proposals seek to provide a dedicated child play space area at ground floor comprising 320 sq.m of doorstep play for 0-5 years. This is in excess of the 100 sqm minimum provision required by the Mayor for doorstep playable areas (Table 4.6) and 270 sqm requirement when applying 10 sqm per child calculations. As set out in the Landscape chapter of the Design and Access Statement, a number of playable features such as small boulders, stepping stones, a balancing beam, and timber posts are integrated into a gently sloping lawn panel, creating an activity route through the landscape resulting in a high quality play area for Under 5's.

- 6.51 Older children will be able to utilise nearby play space in Lampton Park (within 200m), Inwood Park (within 800m) and Hounslow Heath (within 2km)

Landscape

- 6.52 A Landscape chapter within the Design and Access Statement and Conceptual Landscape Masterplan has been prepared by LDA Design in support of the application. It sets out the design proposals for streetscape, the public realm including amenity and play space, private gardens and defensible space, as well as communal rooftop terraces.
- 6.53 The proposed landscape seeks to complement the surrounding residential character and utilises a mix of sympathetic hardworks materials and maintain the public realm (NPPF paragraph 127(c)). Soft landscape zones have been introduced to contribute to urban greening (London Policy 5.10), and trees, squares, and pedestrian access routes have been introduced in suitable locations to add to the green infrastructure network (Local Policy GB4 and CC2). Furthermore, a suburban planting concept and palette has been chosen to ensure that landscape treatment is of the highest quality and in keeping with local character (London Policy 7.4 and 7.5)

Trees

- 6.54 An Arboricultural Impact Assessment and Method Statement has been prepared by Crown Consultants and is submitted in support of the proposals. Please refer to report for full details.
- 6.55 Home Group has worked hard to retain as trees many as possible on site and proposes to use particular construction techniques and safeguarding mechanisms to retain trees of specific value that add to area's character (Local Policy CC1), i.e. a timber frame bike store will be used in order to retain Category A Lime Tree (T43) on site. Four trees (T20, T21, T36 and T43) will be pruned to create an adequate clearance from the proposal. Lastly, building foundations are proposed within the Root Protection Areas of four trees (T10, T21, T36 and T43) this will be undertaken by hand and overseen by a trained arborist where necessary (London Policy 7.21 and Local Policy CC2).
- 6.56 In order to facilitate the estate regeneration it is proposed to remove 23no. trees. The majority of the trees to be removed are Category C which are considered to have a low amenity value. Several of the trees are not visible from public vantage points and consequently their removal will not have a significant impact on the visual amenity of the locality. It is proposed to remove two Category U trees due to their location, these trees are in such poor condition that they should be removed regardless of development proposals. One Category B- tree will be removed, however this is considered acceptable

as the tree is not considered to have a particularly high amenity value and is understood to have a limited life expectancy. Its removal shall not have a significant negative impact on the visual amenity of the locality. To summarise the Arboricultural Impact Assessment and Method Statement concludes that the removal of the relevant trees will have a localised amenity impact.

- 6.57 The loss in local visual amenity can be mitigated for by undertaking replacement landscaping within the Site. The proposed planting scheme has had to be designed to maximise opportunities for planting. LDA Design has prepared the submitted Conceptual Landscape Masterplan, which indicates the proposed locations and species of replacement trees. It is proposed to introduce 2 new trees alongside the eastern boundary and 2 new trees adjacent to the western boundary to respond to comments from existing neighbours. It is also proposed to introduce a large feature tree as an entry marker to the Site (London Policy 7.21). In total 6 new trees are proposed on the Site.

Transport and Highways

Transport Reports

- 6.58 In support of the proposals, Waterman has prepared a Transport Statement, Road Safety Audit and Travel Plan. In combination these reports assess the transport and highway impact of the proposals, seek to encourage the use of sustainable travel modes, and manage the impact of the proposals on the local transport network.
- 6.59 A Transport Statement has been prepared in line with policies. The Transport Statement sets out that the movement associated with the proposed development will not be detrimental to road safety or traffic capacity owing to the reduced quantum of car parking proposed. Thereby the implications on highway safety and the residual cumulative impacts are not considered to be severe.
- 6.60 The Site benefits from a PTAL rating of 3 ('moderate') and is only some 500m from areas of PTAL 6 ('excellent'), accordingly the Site is in 200m walking distance from Hounslow Central Underground Station and a number of key bus routes and is considered to be highly sustainable. The report confirms that 52.2% of residents currently use sustainable modes to travel to work, and it is considered that this will continue.

6.61 A detailed Travel Plan (TP) has been prepared with reference to the good practice and guidance documents published by the Department for Transport (DfT) and Transport for London (TfL) as required by Local Plan Policy C12(I). The principal aim of the TP for the development is to help reduce car usage (particularly single occupancy journeys) and increase the use of walking and cycling.

6.62 The Travel Plan should be reviewed in detail, in summary the key objectives include:

- Increase public transport awareness – On occupation bus, rail maps and timetable will be provided, alongside promotion of smartphone apps and walking routes.
- Increase walking – Information will be provided on the ‘on and off highways’ pedestrian network on arrival, and provision of high quality pedestrian environment will be included on site.
- Increase cycling – The scheme will seek to increase number of residents cycling to work, shops, leisure and school by 5% over the period of the TP, via provision of secure and illuminated cycle parking at residential areas and cycle mapping.
- Increase working from home – The benefits will be promoted on occupation, and units will be wi-fi/broadband enabled prior to occupation.
- Promote car club - Discussions have taken place with Zipcar regarding a proposed car club on site. Zipcar recommends that residents utilise the existing network of vehicles in the first instance. Zipcar will also provide a fully managed service, which includes no vehicle installation – membership only, all homes to receive 2 year membership and £25 driver credit for the first occupant of each home.

6.63 A Travel Plan Co-ordinator will work in conjunction with the LPA, the local community and other interested parties for the continuing progression of the Travel Plan. The Travel Plan will be monitored periodically to be conducted at the end of years 1, 3 and 5 to be carried out within 3 months of occupation or at 70% capacity (whichever is first).

Road Safety Audit

6.64 A Road Safety Audit has been prepared by Allen Transport Consultancy Ltd and Waterman’s Designer Response is submitted in support of the application as part of the Transport Statement. Please refer to the full report for comprehensive details.

6.65 In summary, the report confirms that potential issues raised at Stage 1 Audit and sets out suitable recommendations for mitigation in regards to the following Stage 1 Audit matters: construction details, swept paths, and trees, pedestrian safety, indiscriminate parking, and gully covers. No issues are foreseen in terms of local alignment and junctions. Points are also identified and suitable design responses provided that are outside the terms of reference and include: substation, location of disabled parking, and approach to permit parking.

Pedestrian, Vehicular and Cycle Access

6.66 Pedestrian, vehicular and cycle access will remain as existing and utilise the Lampton Road priority layout access junction. The proposals seek to include a minor reconfiguration of the current access route to result in a better alignment and introduce the following changes:

- Single 1.5 m footway entering the Site along the northern and eastern sides of the access road, in full accordance with DFT Inclusive Mobility standards.
- Kerb upstand no higher than 60mm.
- Partially staggered alignment past Block A to reinforce the character of the Proposed Development and to accommodate a new sub-station;
- Reconfigured parking to run perpendicular along the east-west alignment, parallel along the north south alignment (parking areas to be Stopped Up and taken out of adopted public highway).
- Introduce landscaping to create an attractive entrance to the Site.

Parking Arrangements

6.67 Current on-street/public parking provision within the Town Centre North CPZ is 12 spaces, including one dedicated disabled parking bay. Off-street parking is provided in 36 private garages on site which, owing to garage size, is not used for its given purpose. The proposals seek to lose 12 on-street car parking spaces and the existing residents garages which equates to a loss of 48 spaces.

6.68 Local policy seeks to promote car free or low car development where appropriate (Local Policy EC2) As such the scheme will provide 22 on-street car parking spaces on site, adjacent to the revised access route. Local policy diverts to the London Plan to set the appropriate maximum number of car parking spaces, as such Table 6.2 of the London Plan Parking Standards Minor Alterations to the London Plan (March 2016) advises that

less than 1 space per unit should be provided for 1-2 bed units, up to 1.5 spaces should be provided for 3 bed units and up to 2 spaces for units of 4 bed or more, which would equate to a requirement of 132 spaces as a maximum. As such the Site's location in a good PTAL area has resulted in a provision that is significantly less than 1 space per unit as per London Plan guidance.

- 6.69 The parking provision is proposed to be allocated to the customers of the re-provided residential units, the level of parking provision proposed has been calculated based on the results of the Housing Verification Forms, from which Home Group in conjunction with Waterman took a considered view to provide car spaces to those residents who have indicated that they would be returning to site and have a car. The market and additional 6 intermediate units will be car-free.
- 6.70 The parking provision is suitable to meet the assessed need and has been carefully considered in the context of the needs of existing residents remaining at the Site. The market and shared ownership units will be marketed as car-free. The decision to rely on current need has been taken in order to further reduce the requirement and help to achieve LB Hounslow's aim to reduce car ownership in the Borough. To assist further, should a resident leave a re-provided affordable unit which has a car parking space, the car parking space will not be passed onto the new residents. Therefore, the level of parking provision will reduce over the lifetime of the development.
- 6.71 On-street parking occupancy in the area around the Site will not be adversely affected by the proposals, with the overall overnight occupancy anticipated to change by no more than 4-5% (from an existing occupancy of 81 / 87%). Parking surveys undertaken on the remaining area survey found that there is adequate on-street capacity to absorb potential overspill parking.
- 6.72 5 of the 22 proposed parking spaces will be configured to be disabled parking spaces, located close to the main entrance with level or gently graded access. In line with guidance received from TfL and the GLA on similar residential schemes, as well as the Draft London Plan T6.1 policy, the proposals will meet the 3% initial provision through providing 4 spaces. The scheme exceeds this requirement by providing an additional compatible disabled parking space. As noted above, the re-provided car parking will not be open to new residents and is expected to reduce over time. The available space will still be usable for disabled residents, and the ongoing allocation, management and purpose of disabled parking will be managed through the Travel Plan (TP) and Parking

Management Plan (PMP). Spaces would be made available in the designated parking area if additional need arise, managed and incentivised through the TP and PMP.

- 6.73 Provision will be made for 20% active and 20% passive charging vehicles in line with London Policy.

Cycle Parking Provision

- 6.74 The current Concorde Close estate does not have any cycle parking provision. Cycle parking facilities are proposed which are in accordance with the London Plan standards. The proposals seek to provide 210 long stay parking spaces for use by residents (Table 6.3). The cycle spaces will be provided within five secure and covered cycle stores located within and adjacent to the residential buildings. Owing to space constraints, the cycle parking comprises a mix of Sheffield stands and double stack racks (e.g. Josta).
- 6.75 4 short stay parking spaces will be provided on site for use by visitors in line with Mayoral Policy (Table 6.3), the spaces are located in areas with good levels of natural surveillance, close to the Site entrance.

Refuse and Servicing Strategy

- 6.76 Waste collection and servicing will take place via the main Lampton Road junction, sufficient tracking has taken place and evidence of such has been submitted as part of the Transport Statement prepared by Waterman, to ensure that all vehicles can enter and exit the Site in forward gear.
- 6.77 The Transport Statement sets out that 15,940l of proposed refuse storage is required and 14 no. Eurobins will be provided. The split in storage will be 50:50 between refuse and recycling.
- 6.78 As agreed with Officers during pre-application discussions a central refuse store is proposed for residents at the ground floor of Core 1 close to the access road. Despite the location increasing the drag distances from Core 3, it is considered that the constrained nature of the Site, and the benefits provided make the location sustainable. The refuse store is conveniently positioned as residents will pass it on a daily basis as they enter and exit the Site, further a refuse collection vehicle is able to get within 25m of the refuse storage area which ensures that refuse carry distances are within the maximum specified

within the Manual for Streets document. On balance, it is considered that the refuse strategy is suitable to meet the requirements for the proposals and Local Policy CC2.

Energy and Sustainability

- 6.79 Local Plan Policy EQ2 aims for new build residential buildings to meet the standards for sustainable design and construction set out in the London Plan. An Energy Strategy (September 2018) has been prepared and submitted in support of the proposals, please refer to the full report for complete details. In summary, the report follows the established Energy Hierarchy as set out in Policy 5.2 of the London Plan: Be Lean, Be Clean, Be Green to reduce energy consumption of the development. Whilst new development is required to achieve zero carbon (regulated energy only). Where this cannot be met, any shortfall to zero carbon can be made up through a payment into the carbon offset fund or through improvements to surrounding buildings, subject to an agreement with the Borough. As a minimum, the proposals should demonstrate a 35% improvement over Part L1A 2013 of the Building Regulations.
- 6.80 Through the use of CHP and PV, the sample SAP calculations indicate an estimated site-wide improvement of 40.07% will be achieved over Part L1A 2013 (with 2016 amendments) of the Building Regulations, thereby complying with this part of the policy. Furthermore, the energy strategy has addressed the key elements of The London Borough of Hounslow's Core Strategy on energy and will make a positive contribution to reducing the Boroughs CO2 emissions.
- 6.81 Nevertheless, as zero carbon is not achieved a payment to the London Borough of Hounslow's carbon offset is proposed. An estimated 81.723 tonne of CO2/year is produced using the specification outlined in this Energy Strategy. Based on the nationally recognised price of £60/tonne of CO2 over 30 years (£1,800/tonne of CO2), a payment of £147,102 will be required for the carbon offset fund. This equates to approximately £1,196 per dwelling. Thereby the proposals accord with local and Mayoral policy.
- 6.82 In terms of decentralised energy networks, the report confirms that there are currently no available or potential district heating networks in the vicinity to connect to. Provisions will be made in the plant room to allow for possible future connections to a district heating network should one become available, in line with London Plan policy 5.5.

Air Quality

- 6.83 Local Policy EQ4 require an Air Quality Assessment to be prepared where major developments to air quality sensitive uses are proposed, to consider the potential impacts of air pollution. Thereby an Air Quality Impact Assessment (September 2018) has been prepared by MLM Consulting Engineers and submitted in support of the planning application.
- 6.84 The Assessment finds that the risk of dust raising activities resulting during the construction phase was considered to be medium risk, and human health impacts were considered to be low risk. Suitable mitigation measures are recommended which seek to control particle generation at the source. Therefore the resulting impact of emissions during demolition and construction is likely to be not significant
- 6.85 In terms of the potential impacts during the operational phase of the proposed scheme, MLM has undertaken detailed dispersion modelling and the results are shown to have a not significant impact. Furthermore, the report finds that future receptors would not be exposed to unacceptable air quality.
- 6.86 In regard to Air Quality Neutral status, an assessment was undertaken to support the planning application, the predicted total emissions will be below the calculated traffic and building emissions benchmark, therefore the proposals are considered to be air quality neutral for both transport and building related emissions. Overall, the report concludes that air quality impacts of the proposed development during construction and operational phases are not significant, and as such the scheme accords with Local Policy EQ4 and Mayoral policy.

Drainage

- 6.87 A copy of the LPA's Drainage Assessment Form has been prepared by Fairhurst. The Form confirms the proposed arrangements for foul and surface water drainage. In summary, the Site proposes to discharge via attenuation and surface water sewer in accordance with London Plan Policies 5.13 and 5.14.

- 6.88 Attenuation volumes will be provided to mitigate surface water flood risk. Attenuation will be provided via below ground geocellular tanks, permeable paving and oversize pipes to enable the rate of runoff from the Site into the receiving sewer to be limited to an acceptable rate to protect against erosion and flooding downstream. The drainage system will be appropriately designed to contain the 1 in 30 year storm and 1 in 100 year storm with no flooding.
- 6.89 The foul water drainage strategy is to discharge to the Thames water sewer using the existing sewer connection. A pre-development enquiry will be submitted to Thames Water for agreement of the proposed foul and surface water discharge in due course.

Noise

- 6.90 Local Plan Policy EQ5 requires new development to have considered the impact of noise, and mitigation of these impacts, on new users and surrounding uses. A Noise Impact Assessment (September 2018) has been prepared by Prism Acoustics, the assessment evaluates the existing noise levels at the Site, and comment on the suitability of the Site for use in residential purposes.
- 6.91 Survey data has been used to set noise emission criteria, in line with London Borough of Hounslow Policy EQ5. The assessment demonstrates compliance with British Standard BS8233: 2014 – Guidance on sound insulation and noise reduction for buildings. The report confirms that suitable internal noise levels within habitable rooms can be achieved by utilising specified glazing and ventilation systems (London Plan Policy 7.15). Utilising the glazing and ventilation constructions will achieve internal ambient noise levels to be less than 35dB(A) and 30dB(A) for daytime/night-time respectively.
- 6.92 The in-situ levels are considered to be NOEL (No Observable Effect Level), noise due to road traffic on the adjacent network should have no perceptible adverse effect on health or quality of life once design guidance is followed. Unfortunately, due to the Site's location in close proximity to Heathrow Airport, external noise levels in garden and amenity areas are impacted upon due to aircraft traffic. As such they are considered to be SOAEL (Significantly Observed Adverse Effect Level). Nevertheless the report sets out that BS 8233:2014 states that the proximity to such a major transport link is a convenience and that a compromise may be considered on a case-by-case basis, and the Site currently comprises residential development, which is considered to be a suitable use on the Site.

- 6.93 In line with London Plan Policy 7.15 and paying regard to the impact of aviation noise on noise sensitive development, Local Policy EQ5 seeks to ensure that developments are located outside the 69dB Heathrow LAeq, 16hrs noise contour, the report confirms that the Site is located in contours between 57-60 dB LAeq 16hours for the day and 51-54dB LAeq, 8hours during the night time hours and is in accordance with policy.

Lighting

- 6.94 The proposed lighting scheme is set out in the submitted Lighting Assessment scheme (MJA-P105-4816 A). The proposals seek to minimise light pollution to adjoining neighbours and biodiversity by providing the minimal amount of light required for the scheme. The LED light lux will be limited throughout, the submitted plan shows the lux levels proposed across the Site. Energy efficiency measures are proposed such as operating the lights via photocell to provide lighting between twilight hours (winter time typically 5pm-6am, summertime 9pm-4am) in accordance with Local Policy EQ6.
- 6.95 The Lighting Assessment has been prepared in consultation with TSA Ecology to understand the potential impact on ecology on the adjacent designated Piccadilly Line Railsides. TSA has advised that lighting around the Railsides in particular should be sensitive to ecology. This will be balanced against a need to ensure the Site is lit sufficiently so that residents and users like feel safe and a dark spot is not created which could encourage anti-social activities. As such the final external lighting design is subject to a further detail lux level calculation and will be sensitive to existing ecology that is focussed on the Railsides.

Contamination

- 6.96 A Geo-Environmental Desk Study Report has been prepared by Fairhurst in support of the proposals, which assesses site history, potential contamination sources, pathways and receptors. In line with Local Policy EQ8 the Desk Study reviews the geological, environmental and historical data available for this site in order to identify potential environmental constraints to the proposed development. Please refer to the full report for details. In summary, the report finds that the Site is likely to contain limited contamination associated with historic/ existing land uses on site, and that the underlying site ground / groundwater conditions may also have been impacted on by off-site sources located within close proximity to the Site.

- 6.97 The report identifies the requirement for an intrusive ground investigation, with a view to target potential sources of contamination within the Site. The following additional surveys are recommended:
- Existing site services should be traced. Requirements and proposals with regard to decommissioning or diverting existing site services should be confirmed. Where pipelines are to be diverted, confirmation should be obtained as to the required easements for access and maintenance.
 - A destructive asbestos survey should be undertaken to investigate the potential presence of asbestos impacted materials.
 - Further research should be undertaken on other potential sources of UXO in addition to unexploded bombs to confirm the low level of risk associated with the Site. This could include a pre-desk study UXO assessment, as considered necessary.
- 6.98 A pre-desk study UXO assessment has been prepared and is submitted in support of the application. It concludes that there is low risk of unexploded ordinance on site and no further work is required.
- 6.99 Home Group has commissioned a ground investigation report, the results of which will be submitted to Officers in due course to confirm whether there is any contamination on site and if so, present proposals for the control of any risks (London Plan Policy 5.21 and Local Policy EQ8).

Biodiversity

- 6.100 Due to the Site's close proximity to the Piccadilly Line Railsides which is a designated Site of Importance for Nature Conservation, a Preliminary Ecological Appraisal has been prepared by TSA Ecology and submitted in support of the application. The report finds that the proposals could indirectly impact on the designated SINC and recommends that a Management Plan is compiled for the Site in order to minimise this impact.

- 6.101 In regards to habitats, works are recommended to replace loss and enhance biodiversity measures to maximise the ecological value of the Site, i.e. soft landscaping that includes native seed/fruit and provision of nesting habitats. Trees to be retained should be protected in accordance with British Standard 5837: 2012. Lastly, precautionary measures are proposed to protect foraging/commuting bats that may use the scattered trees along the Site boundaries. As a result minimal lighting has been proposed, to maintain 'dark' areas and corridors.
- 6.102 In terms of protected species, the report identifies that there is likelihood of bats, nesting birds and terrestrial mammals on site. The buildings on sites and trees which are likely to be subject to removal are not considered suitable to support roosting bats. However, a precautionary approach is recommended in respect of building / demolition works. This approach has been discussed and agreed with LB Hounslow Ecology Officer. In regards of birds, vegetation clearance will be undertaken outside the nesting bird season. For terrestrial mammals it is recommended that any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape.
- 6.103 It is considered that the proposals avoid any adverse impact on the SINC designation. Where potential impact may be experienced, the proposal will seek to utilise appropriate mitigation in line with the above recommendations and in accordance with Local Policy GB7 and London Plan Policy 7.19. Such measures can be secured by way of condition.

COMMUNITY INFRASTRUCTURE LEVY (CIL)/ PLANNING OBLIGATIONS

- 6.104 The Mayoral CIL (MCIL) for LB Hounslow is currently charged at £35 per sq.m of development in excess of 100 sq.m.
- 6.105 The Mayor is currently undergoing consultation on MCIL2, which will increase the Mayoral CIL rate for LB Hounslow to £60 per sq.m once adopted. MCIL2 underwent Examination in Public on 18-19 September 2018, subject to a positive Inspector's report MCIL2 will be effective from 1 April 2019.
- 6.106 LB Hounslow adopted its own CIL charges on 24 July 2015. The Site is located within CIL Zone 2 (Central) which is subject to a charge of £110 per sq.m. for residential development. This figure is subject to indexation and the increase will be calculated accordingly.

6.107 During discussions with Officers held to date, it has been identified that the following will form the basis of the Section 106 legal agreement:

- i. Affordable housing;
- ii. Employment;
- iii. Construction;
- iv. Carbon Offsetting payment;
- v. Open space contribution to Lampton Park;

7.0 SUMMARY AND CONCLUSIONS

- 7.1 In conclusion the case for development and case for estate regeneration must be considered together in order to determine the application appropriately. The case for development has been set out above in the Planning Statement, whereas the case for estate regeneration and affordable housing has been set out in the separately submitted Case for Estate Regeneration and Affordable Housing Statement. The key points are summarised below.
- 7.2 The current estate comprises 43 affordable homes in social and affordable rents. The estate is suffering from several key socio-economic issues including insufficient mix and size of dwellings to meet housing needs; poorly designed public and private space resulting in fly tipping, rough sleepers and non-residents accessing the block. The Site is considered to be failing and has been identified for estate regeneration. Comprehensive renewal via demolition is considered as the most viable option.
- 7.3 The proposals successfully meet the requirements for estate regeneration. The proposals meet the policy requirement to re-provide the existing level of affordable floorspace in the current affordable rent and social rents tenure. In fact the proposals achieve an uplift of 27% due to the additional unit to address existing overcrowding and increases in unit sizes to meet current internal space standards. The proposals meet the better quality test through provision of London plan internal standards, access to private amenity, and incorporating sustainable energy methods to reduce running costs and meet the necessary sustainability targets.
- 7.4 The proposed 74no. market units will provide much needed additional housing for the borough and is providing the cross subsidy role for the re-provision of affordable housing. In addition it enables the provision of intermediate housing with 6no. shared ownership units. The submitted viability assessment demonstrates that the scheme is compliant with Local policy in that this is the maximum additional provision (beyond estate regeneration re-provision) that the scheme can reasonably afford.
- 7.5 The mix for the re-provided affordable units has been prepared in order to meet the identified housing need on site and is considered acceptable. The mix of the new shared ownership units and the market units, with the emphasis on 1 and 2 bedroom units, are considered suitable due to the flatted nature of the scheme and proximity to Hounslow Central Underground Station.

7.6 The proposals have been designed to reduce impact on existing built form, and to respect neighbouring amenity. Appropriate design mechanisms such as setting back the top two floors, utilising recessed balconies where possible, and utilising lighter materials have been chosen in order to reduce the mass of the proposals and improve the resulting visual impact for neighbours. Separation distances to maintain privacy are secured.

7.7 The following key matters of detail are also considered suitable:

- Private amenity space provision greatly exceeds policy requirements and will help to improve quality of life for residents.
- Whilst it is not possible to provide policy compliant communal amenity space, the proposed offer is extremely high quality and will feature elements such as roof terraces and community areas which represents a considerable improvement on current provision.
- Whilst it is not possible to meet the scheme's play space requirement in its entirety on site. The proposed level of play space for Under 5's greatly exceeds the amount required by policy. The current estate has no provision, it is proposed to provide high quality, safe play area which will greatly improve the quality of life for young children.
- The proposed level of car parking is suitable in order to meet the identified need for returning residents. Provision for 5 disabled parking spaces has been included. The Site will be car free for all other residents. Cycle parking provision in line with the London Plan standards will ensure that the Site is sustainable. The Site is very accessible due to the location adjacent to the Hounslow Central station and proximity to local bus routes.
- The scheme results in a loss of 23 trees across the Site. With the exception of one Category B- tree, the remainder are Category C and below, they are considered to be of low quality and low amenity value. Thereby any loss of trees will have a localised amenity impact. In order to mitigate against this loss it is proposed to plant 6no. new trees on the Site as part of the landscaping scheme to create an attractive development.

- In terms of air quality, the medium risks resulting from dust during construction can be appropriately mitigated against. No risks are foreseen during the operational phase of the proposals. Lastly, the proposals are considered to be air quality neutral for both transport and building related emissions.
- It is proposed to utilise foul and surface water drainage via attenuation and surface water sewers. Required confirmation is being sought from Thames Water.
- The use of specified glazing and ventilation systems will ensure internal noise levels suitable for the proposed use, and ambient noise levels will be achieved. External noise levels are impacted upon due to the Site's proximity to Heathrow Airport. Nevertheless, the location is considered a convenience and should be considered against the merits of the scheme. Further, the Site's current residential use should also be considered in support of the proposals.
- The proposed lighting scheme is considered to be in line with the current on site lighting. It will ensure sufficient lighting is maintained for the residential use, whilst remaining at an appropriate level to avoid impact on neighbouring residents or ecology. Suitable restrictions have been proposed to ensure the scheme is energy efficient.
- In terms of contamination, an initial Desk Study has been undertaken which has found there to be potential contamination on site. AS such Home Group has commissioned the recommended surveys to be undertaken, the results of which will be provided when available.
- In terms of biodiversity it is not considered that protected wildlife or vegetation is located on the Site, suitable precautionary measures have been recommended and will be taken should they be found on the Site. Similarly measures to mitigate against any impact on the Piccadilly Line Railsides will be followed.

APPENDIX 1
PPA1 OFFICERS WRITTEN RESPONSE, DATED 2 OCTOBER 2017



Regeneration, Economic Development
and Environment Department
Email: planning@hounslow.gov.uk

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

Victoria Bullock
Barton Willmore
7 Soho Square
London
W1D 3QB

Your contact: Melek Ergen
Direct Line: 020 8583 5166
Email: melek.ergen@hounslow.gov.uk
Our ref: 01414/A/PPA1
PPA/2017/3658
Date: 2 October 2017

Victoria.bullock@bartonwillmore.co.uk

Dear Ms Bullock,

Concorde Close, Hounslow TW3 1HH

Redevelopment of the estate to provide mix of houses and flats with differing heights up to 12 storeys estimated 160 units.

Further to your meeting regarding the above site with my colleagues Melek Ergen, Pratima Sood, David Watson and Justin Kliger. I write to confirm the details of your discussion and our advice. The comparative lack of detail at this stage limits our ability to comment as helpfully as we might.

Site appraisal

- The site is owned by a housing association, Home Group and comprises 43 affordable homes on social and affordable rent.
- It is 'L' shaped site with three storey buildings made up of 43 flats and maisonettes with number of single storey garages to the rear.
- The site is close to Hounslow Central Underground station, Hounslow Town Centre and Lampton Park.

Principle of development

- The Council understands the need for estate regeneration and agrees that it would be beneficial and we support your client's intention of re-provision with an upgrade.
- The objectives of the NPPF, the London Plan and policies of the adopted Local Plan all seek to maximise housing on previously developed sites and encourage re-use of brownfield sites. The principle of estate regeneration is acceptable subject to accessibility, design, quality of housing and protecting neighbours' and future occupiers living conditions as well as provision of affordable housing in line with the policies.
- We therefore consider that the principle accords with NPPF objectives, the London Plan and adopted Local Plan policies, which all seek to maximise housing on previously developed sites and encourage re-use of brownfield sites. Residential development is thus acceptable subject to access, design, quality of housing and protecting neighbours' and future occupiers living conditions.
- However, whilst the conceptual masterplan seems interesting, the Council does not share your vision of the village concept and the proposed options would not be acceptable.

- The options which include buildings up to 12 storeys would not be considered suitable to this location. They would be significantly out of scale and character with the surrounding area and would have an unacceptable effect on neighbouring residents. The existing site and surrounding character would allow up to three storeys in height. The height is substantially beyond that which the Local Plan would envisage as acceptable on this site.

Housing amount and mix

- The site is considered to be in an urban location with a mix of very good and moderate PTAL and in accordance with London Plan Table 3.2, the density range could be between 200-700 hr/ha (not more than 260 units per hectare – although this requires refinement based on the unit mix). Because of the intervention of the Piccadilly Line, I would not think that you could characterise this site as Central, notwithstanding its proximity to Hounslow Town Centre. Density is, however, a secondary consideration to good design and placemaking and it is difficult to envisage how this proposal could fit adequately into its context.
- The Council’s housing mix need is detailed in Policy SC3 and outlined in the following table. The proposals are 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%

Design

- Policy 7.1 of the London Plan requires the design of new buildings and the spaces around them to reinforce or enhance the character of the neighbourhood. Policy 7.4 requires design of the building to respond appropriately to the local character. Policy 7.6 requires high quality architecture and materials.
- Local Plan policies CC1 and CC2 require all new development to preserve and enhance the special qualities and heritage of an area and state that the Council will promote and support high quality urban design and architecture to create attractive, distinctive, and liveable places.
- Local Plan Policy SC4 (Scale and Design of New Housing Development) seeks new development to balance the need to make efficient use of land and achieve high quality design and accessibility, whilst respecting and responding to local context and character, and protecting existing residents’ amenity.
- We would expect any planning application to demonstrate how the proposal would comply with these policies, particularly in this case 7.1, 7.4, CC1 and CC2.

Internal and external amenity

- London Plan Policy 3.8, together with the Mayor’s Housing SPG (2016) seek to promote housing choice and a balanced mix of unit sizes in new development. London Plan Table 3.3 sets minimum space standards for dwellings of different sizes and has been updated to reflect the Nationally Described Space Standards (NDSS). These standards are based on the minimum gross internal floor area (GIA) required for new homes relative to the number of occupants, whilst also taking account of commonly required furniture and spaces needed for different activities and moving around. Local Plan Policy SC5 requires development proposals to demonstrate compliance with these standards. Any proposal should meet the NDSS.

- The external space standards adopted in Council Policy SC5 to reflect the character of the borough would apply here and not the more general London standards of the London Plan. All new housing should thus comply with the Council's benchmark external space standards.
- The Local Plan refers to provision of combination of private and communal amenity space for flatted developments. Policy SC5 states that a minimum of 5 m² of private outdoor space for a 1-2 person dwelling and an extra 1 m² should be provided for each additional occupant of that dwelling. The policy also states that the communal external space should be provided no less than 25 m² for each flat up to three habitable rooms, 30 m² for up to four habitable rooms and 40 m² for each flat up to five habitable rooms.
- Any submission must comply with the private and communal amenity space standard requirements.

Access, parking and servicing

- Local Plan policy EC2 states that the Council will seek to promote a more sustainable local travel network and maximise opportunities for walking, cycling and using public transport. It seeks to ensure that developments demonstrate that a minimum number of cycle parking spaces and an appropriate maximum number of car parking spaces consistent with the standards in the London Plan.
- Considering the location we would accept a car-free development and we would restrict residents from obtaining parking permits for the surrounding CPZ, which you would need to achieve by means of a S106 agreement.
- Local Plan policy EC2 states that cycle parking should be of high quality, covered, secure and integral to building design. It should also be easily accessible, by being located at ground floor level, close to entrances and/or building cores, having internal and external access, and avoiding vertical or semi-vertical stands which are not fully accessible. Locating the main entrance to the flats to ground floor level would allow for cycle parking to be provided in the most suitable location and would promote its use.
- Refuse storage needs to be within ten metres of the nearest collection point otherwise a management strategy is required which details how refuse collection would be achieved without leaving bins on the public highway.

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 which sets 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 a Part L (2013) can be achieved.
- It is likely that there would be conditions about 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 CIL charging schedule on 1 July 2015. In summary, the charge is

£110/m² gross internal floor space. Details of the LB Hounslow Community Infrastructure Levy Charging Schedule and how it applies to development can be found on our website.

- Your client must complete and submit the Determining whether a Development may be CIL Liable form, available from the above website, with any planning application for this proposed development.
- In addition, the Mayor of London's CIL would also apply at a rate of £35.00/m² gross internal floor area.

Affordable housing

- The Council's Housing Partnerships and Solutions Team support the principles of estate regeneration that have been set out. We welcome that there would be no loss of affordable housing provision on site. Any proposed additional uplift should contribute the Council's 40% affordable housing strategic target and be in accordance with Local Plan Policy SC2 - Maximising the provision of affordable housing. A review mechanism upon partial or full completion of the development would be applied if the financial viability assessment demonstrates that current market conditions would support less than 40% affordable housing on any additional uplift.
- We require a full viability assessment, which is a validation requirement, 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.

Trees

- There are two Tree Preservation Orders on the site - 1-12 Concorde Close (676/U/TPO1/T6) and rear of 19 Concorde Close (676/U/TPO1/T2) and any further development proposal must take into account of these trees.

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

Whilst the principle of estate regeneration at this site is acceptable, the Council is concerned with the proposed development, especially in terms of proposed height and its impact on the surrounding area and neighbours. Your proposed options are not acceptable as they stand. We feel that there is scope to carry out this estate regeneration and provide some additional housing on the site with a modest height and scale. Please re-think your proposal and come back to us with a more moderate scheme. If you do, we will be happy to engage in a discussion with a view to a positive outcome.

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.

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.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Robert Coomber', with a long horizontal flourish extending to the right.

Robert Coomber
Central Area Planning Manager

APPENDIX 2
PPA3 OFFICERS WRITTEN RESPONSE, DATED 25 JULY 2018



Victoria Bullock
Barton Willmore
7 Soho Square
London
W1D 3QB
Victoria.bullock@bartonwillmore.co.uk

Your contact: Melek Ergen
Direct Line: 020 8583 5166
Email: melek.ergen@hounslow.gov.uk
Our ref: 01414/A/PPA1
PPA/2017/3658
Date: 25 July 2018

Dear Victoria,

Concorde Close, Hounslow TW3 1HH
Redevelopment of the estate with three to six storey buildings to provide 123 units.

Further to our meeting regarding the above site on 4th July 2018 with me and my colleagues Pratima Sood, Ciaran Coughlan, Melvin Andrews and Justin Kliger. I write to confirm the details of our discussion and advice.

- As previously stated, the Council supports the regeneration of this estate and no objection to the principle of redevelopment.
- We are pleased that the points raised during the first and second meeting are taken into account and your revised scheme is much closer to the final.
- The height of the buildings up to six storey is considered acceptable in principle, however there are pinch points which you already identified and impact of this height to the houses on Lampton Park Road identified and discussed during the meeting 2. The current re-arrangement and further set-back considered to be addressing these concerns on buildings B, C and D.
- The re-arrangement of height to Building A needs to be looked further. The some of the bulk of top rear two storey could be placed to front as a single storey.
- We accept that the additional building along the railway track would not be feasible.
- There were big concerns over the number of single aspect units previously which the architects now assessed and revised the cores. The preferred option is reasonable and accepted. The numbers of single aspect units are now reduced. However it is noted that relocation of bin stores within Building A and further windows to Lampton Road frontage could reduce the numbers of single aspect units further.
- Considering the numbers of single aspect units within the proposal we would like to see daylight/sunlight report for all the units to ensure the quality of proposed units.
- It is noted that bin storages and plant rooms are now integrated into the design placed within the building which considered being a good solution. The location of bike storages are

considered to be acceptable but please be aware of access requirements to the stores as all needs to comply with West London Cycle Parking Guidance.

- The proposal also now involves a sub-station and it is explained to us that due to the access issues it is placed within close proximity to Lampton Road. The substation is in a very predominant location and we are not convinced with 'Guardian House' design concept. You may explore other accessible but discreet areas within the site.
- During the second meeting there were concerns for the design feature on the stair cores and the architects provided further three alternative designs. Looking back again, out of all of the options, the original design from pre-application meeting 2 (tree) would be the preferred option.
- In terms of submission documents, please see the attached sheet for your information.
- I can confirm that your viability assessment conclusion is accepted by our consultants. However, we would still encourage you to discuss further possibility of provision of socially rented housing on site with our affordable housing team.

Conclusion

I think the proposal is improved significantly and if the above issues are addressed we can support the scheme.

Please let me know when the consultation with the existing residents would be and your likely date of submission, so I can arrange a date for Planning Developments Presentation.

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.

Yours Sincerely,

The image shows a handwritten signature in black ink. The letters 'MER' are written in a stylized, slightly slanted font. Below the letters, there is a thick, horizontal, slightly wavy line that serves as a signature flourish.

Melek Ergen
Deputy Planning Manager
Central Area

APPENDIX 3
PROPOSED ACCOMMODATION SCHEDULE, PREPARED BY FARRELLS

Concorde Close

Proposed Accomodation Schedule

HGCC-FAR-SW-SC-PA-00123

27.09.2018

FARRELLS

7 Hatton Street
London NW8 8PL
United Kingdom
www.farrells.com

Block A (Core 1) Market & Shared Ownership

 Accessible Units

Level	Flat Number	Occupancy	Tenure	Affordable Tenure	Area (NIA) (m ²)	Private Amenity Area (m ²)
Ground Floor						
Ground Floor	A.00.01	1b2p	Market	-	57	22
Ground Floor	A.00.02	1b2p	Affordable	Shared Ownership	57	22
Ground Floor	A.00.03	2b4p	Market	-	70	22
Ground Floor	A.00.04	2b4p	Market	-	78	7
Ground Floor	A.00.05	2b3p	Market	-	68	6
Ground Floor	A.00.06	2b4p	Market	-	72	60
Ground Floor	A.00.07	1b2p	Market	-	53	51
Level 01						
Level 01	A.01.01	1b2p	Market	-	50	5
Level 01	A.01.02	1b2p	Market	-	50	5
Level 01	A.01.03	2b3p	Market	-	61	7
Level 01	A.01.04	2b4p	Market	-	72	7
Level 01	A.01.05	2b4p	Market	-	70	7
Level 01	A.01.06	2b4p	Market	-	78	7
Level 01	A.01.07	2b4p	Market	-	72	7
Level 01	A.01.08	2b4p	Market	-	72	7
Level 02						
Level 02	A.02.01	1b2p	Market	-	50	5
Level 02	A.02.02	1b2p	Market	-	50	5
Level 02	A.02.03	2b3p	Market	-	61	7
Level 02	A.02.04	2b4p	Market	-	72	7
Level 02	A.02.05	2b4p	Market	-	70	7
Level 02	A.02.06	2b4p	Market	-	78	7
Level 02	A.02.07	2b4p	Market	-	72	7
Level 02	A.02.08	2b4p	Market	-	72	7
Level 03						
Level 03	A.03.01	1b2p	Market	-	50	5
Level 03	A.03.02	1b2p	Market	-	50	5
Level 03	A.03.03	2b3p	Market	-	61	7
Level 03	A.03.04	2b4p	Market	-	72	7
Level 03	A.03.05	2b4p	Market	-	70	7
Level 03	A.03.06	2b4p	Market	-	78	7
Level 03	A.03.07	2b4p	Market	-	72	7
Level 03	A.03.08	2b4p	Market	-	72	7
Level 04						
Level 04	A.04.01	1b2p	Market	-	56	5
Level 04	A.04.02	1b2p	Market	-	56	5
Level 04	A.04.03	2b3p	Market	-	61	7
Level 04	A.04.04	2b4p	Market	-	72	7
Level 04	A.04.05	2b4p	Market	-	70	7
Level 04	A.04.06	2b4p	Market	-	78	7
Level 04	A.04.07	2b4p	Market	-	71	7
Level 04	A.04.08	2b4p	Market	-	71	7
Level 05						
Level 05	A.05.01	1b2p	Market	-	56	5
Level 05	A.05.02	1b2p	Market	-	52	81
Level 05	A.05.03	2b4p	Market	-	70	83
Level 05	A.05.04	2b3p	Market	-	68	7

Blocks B & C (Core 2) Market & Shared Onwership

 Accessible Units

Level	Flat Number	Occupancy	Tenure	Affordable Tenure	Area (NIA) (m ²)	Private Amenity Area (m ²)
Ground Floor						
Ground Floor	B.00.01	1b2p	Market	-	52	5
Ground Floor	B.00.02	1b2p	Market	-	51	5
Ground Floor	B.00.03	1b2p	Market	-	51	5
Ground Floor	B.00.04	2b3p	Market	-	64	39
Ground Floor	B.00.05	2b4p	Market	-	74	69
Ground Floor	B.00.06	2b4p	Market	-	72	22
Ground Floor	B.00.07	2b4p	Market	-	72	19
Ground Floor	B.00.19	2b4p	Affordable	Shared Ownership	85	14
Ground Floor	B.00.20	1b2p	Affordable	Shared Ownership	54	20
Ground Floor	B.00.21	2b4p	Affordable	Shared Ownership	74	14
Level 01						
Level 01	B.01.01	1b2p	Market	-	52	5
Level 01	B.01.02	1b2p	Market	-	51	5
Level 01	B.01.03	1b2p	Market	-	51	5
Level 01	B.01.04	2b3p	Market	-	64	7
Level 01	B.01.05	2b4p	Market	-	74	7
Level 01	B.01.06	2b4p	Market	-	72	7
Level 01	B.01.07	2b4p	Market	-	72	7
Level 01	B.01.08	2b4p	Affordable	Shared Ownership	77	7
Level 01	B.01.09	2b4p	Affordable	Shared Ownership	77	7
Level 02						
Level 02	B.02.01	1b2p	Market	-	52	5
Level 02	B.02.02	1b2p	Market	-	51	5
Level 02	B.02.03	1b2p	Market	-	51	5
Level 02	B.02.04	2b3p	Market	-	64	7
Level 02	B.02.05	2b4p	Market	-	74	7
Level 02	B.02.06	2b4p	Market	-	72	7
Level 02	B.02.07	2b4p	Market	-	72	7
Level 03						
Level 03	B.03.01	1b2p	Market	-	52	5
Level 03	B.03.02	1b2p	Market	-	51	5
Level 03	B.03.03	1b2p	Market	-	51	5
Level 03	B.03.04	2b3p	Market	-	64	7
Level 03	B.03.05	2b4p	Market	-	74	7
Level 03	B.03.06	2b4p	Market	-	72	7
Level 03	B.03.07	2b4p	Market	-	72	7
Level 04						
Level 04	B.04.01	1b2p	Market	-	52	13
Level 04	B.04.02	1b2p	Market	-	51	13
Level 04	B.04.05	2b4p	Market	-	75	88
Level 04	B.04.06	2b4p	Market	-	77	88

Blocks C & D (Core 3) Affordable Rent & Social Rent

 Accessible Units

Level	Flat Number	Occupancy	Tenure	Affordable Tenure	Area (NIA) (m ²)	Private Amenity Area (m ²)
Ground Floor						
Ground Floor	B.00.12 Lower	3b5p	Affordable	Affordable rent	54	62
Ground Floor	B.00.13 Lower	3b5p	Affordable	Affordable rent	54	66
Ground Floor	B.00.14	4b7p	Affordable	Affordable rent	109	198
Ground Floor	B.00.15	3b5p	Affordable	Affordable rent	89	8
Ground Floor	B.00.16	1b2p	Affordable	Social rent	51	6
Ground Floor	B.00.17	3b4p	Affordable	Social rent	83	7
Level 01						
Level 01	B.00.12 Upper	3b5p	Affordable	Affordable rent	48	
Level 01	B.00.13 Upper	3b5p	Affordable	Affordable rent	47	
Level 01	B.01.10	2b4p	Affordable	Affordable rent	77	7
Level 01	B.01.11	2b4p	Affordable	Affordable rent	77	7
Level 01	B.01.14	4b7p	Affordable	Social rent	109	10
Level 01	B.01.15	3b5p	Affordable	Social rent	89	8.5
Level 01	B.01.16	1b2p	Affordable	Affordable rent	51	5
Level 01	B.01.17	3b4p	Affordable	Social rent	83	85
Level 02						
Level 02	B.02.08	2b4p	Affordable	Social rent	79	7
Level 02	B.02.09	2b4p	Affordable	Social rent	79	7
Level 02	B.02.10	2b4p	Affordable	Affordable rent	74	7
Level 02	B.02.11	2b4p	Affordable	Social rent	74	7
Level 02	B.02.12	1b2p	Affordable	Social rent	54	5
Level 02	B.02.13	1b2p	Affordable	Social rent	54	5
Level 02	B.02.14	3b6p	Affordable	Social rent	109	10
Level 02	B.02.15	3b5p	Affordable	Social rent	89	8.5
Level 02	B.02.16	1b2p	Affordable	Social rent	51	5
Level 02	B.02.17	3b4p	Affordable	Social rent	83	8.5
Level 03						
Level 03	B.03.08	2b4p	Affordable	Social rent	79	7
Level 03	B.03.09	2b4p	Affordable	Social rent	79	7
Level 03	B.03.10	2b4p	Affordable	Social rent	74	7
Level 03	B.03.11	2b4p	Affordable	Social rent	74	7
Level 03	B.03.12	1b2p	Affordable	Social rent	54	5
Level 03	B.03.13	1b2p	Affordable	Social rent	54	5
Level 03	B.03.14	4b7p	Affordable	Social rent	109	10
Level 03	B.03.15	3b5p	Affordable	Social rent	89	8.5
Level 03	B.03.16	1b2p	Affordable	Social rent	51	5
Level 03	B.03.17	3b4p	Affordable	Social rent	83	8.5
Level 04						
Level 04	B.04.03	2b4p	Affordable	Social rent	71	15
Level 04	B.04.04	2b4p	Affordable	Social rent	71	15
Level 04	B.04.07	2b3p	Affordable	Affordable rent	63	15
Level 04	B.04.08	2b3p	Affordable	Affordable rent	62	15
Level 04	B.04.09	1b2p	Affordable	Social rent	52	13
Level 04	B.04.10	1b2p	Affordable	Social rent	51	13
Level 04	B.04.11	2b4p	Affordable	Social rent	75	88
Level 04	B.04.12	2b4p	Affordable	Social rent	77	88
Level 05						
Level 05	B.05.03	2b4p	Affordable	Social rent	71	7
Level 05	B.05.06	2b4p	Affordable	Social rent	71	7
Level 05	B.05.07	2b3p	Affordable	Affordable rent	63	7
Level 05	B.05.08	2b3p	Affordable	Affordable rent	62	7