

## Report of the Head of Planning, Sport and Green Spaces

**Address** FORMER WEST DRAYTON POLICE STATION STATION ROAD WEST  
DRAYTON

**Development:** Demolition of the existing Police Station, outbuildings and concrete  
hardstandings, part retention of the listed walls and the construction of 12  
semi detached houses, together with a 4 storey block of 31 flats, a with  
associated car and cycle parking and access road.

**LBH Ref Nos:** 12768/APP/2014/1870

**Drawing Nos:** 1105 PA 101 Views  
1105 PA 102 Views  
1105 PA 103 Views  
1105 PA 104 Views  
Air Quality Assessment  
Arboricultural Assessment Report  
Energy Assessment  
Noise Impact Assessment  
Sustainability Report  
Transport Statement 4th Issue  
Tree Assesment for Bats  
DAS Heritage & Planning Statement received 24-11-14  
1105 PA 002 Rev. A  
1105 PA 001  
1105 PA 010 (fe) Rev. C  
1105 PA 011 Rev .C  
1105 PA 012 Rev . B  
1105 PA 013 Rev. C  
1105 PA 014 Rev. C  
1105 PA 015 Rev B  
1105 PA 016 Rev. B  
1105 PA 039 Rev. A  
1105 PA 030 Rev B  
1105 PA 022 Rev. B  
1105 PA 031 Rev. B  
1105 PA 032 Rev. A  
1105 PA 033 Rev. A  
1105 PA 040  
1105 RP FWDPS Lifetime Homes & Wheelchair Housing Appraisal.  
1105 PA 106 Rev. A ARTIST IMPRESSIONS  
1105 PA 105 Rev. A ARTIST IMPRESSIONS  
1105 DAS FWDPC Revised D & A Statement  
1105 PA 041  
1105 PA 042  
Archaeological Evaluation Ref: CBAS0557  
5392\_101c  
5392\_100c  
1105 PA 021C  
1105 PA 020B  
1105 PA 003B

1105 010E  
Solar Slate PV Tiles Brochure

<b>Date Plans Received:</b>	30/05/2014	<b>Date(s) of Amendment(s):</b>	30/05/2014
<b>Date Application Valid:</b>	10/06/2014		23/02/2015
			13/11/2014
			24/11/2014
			07/11/2014

**1. SUMMARY**

Planning permission is sought for residential development involving the demolition of all the existing buildings on the former West Drayton Police Station Site site and the erection of a 4 storey block at the front of the site containing 31 flats, with 6 pairs of 3 storey semi detached houses at the rear of the site, together with associated car parking, access and landscaping.

The entire site is located within the West Drayton Green Conservation Area and within an Archaeological Priority Area. Drayton Hall, which abuts the site to the north, is a Grade II Listed building.

The principle of housing on the site is acceptable given that the Mayor's Office for Policing and Crime has disposed of the site on the basis that it is surplus to its requirements and replacement facilities are being provided in the vicinity, which adequately meet the policing needs of the local population. In addition, the site has been marketed since 2013, but no community based operators have expressed an interest in acquiring the site for these purposes.

106 surrounding property owners/occupiers have been consulted 6 letters have been received objecting to the proposal mainly on the grounds of inadequate services in the area and impact on residential amenity.

The proposed scheme would be within the London Plan density guidelines, providing good internal and external living space. The proposed layout would not have an adverse impact on the living conditions of surrounding occupiers in terms of overdominance, loss of privacy and loss of daylight/sunlight. It is considered that the scale and layout of the proposed development would be compatible with sustainable residential quality, having regard to the specific Conservation Area constraints of this site.

The proposed sustainability measures will enable a reduction in CO2 emissions and the provision of on-site renewable energy. Given the applicant's agreement in principle to provide renewable energy measures as part of the development, it is considered that this matter could be dealt with by a suitable planning condition in the event of planning permission being granted.

There are no adverse impacts upon ecology or archaeology and highway and pedestrian impacts are considered to be acceptable. The application is therefore recommended for

approval, subject to conditions and a S106/278 Agreement.

## 2. **RECOMMENDATION**

**A. That the Council enters into an agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) and/or Section 278 of the Highways Act 1980 (as amended) and/ or other appropriate legislation to secure:**

**(i) Transport: All on site and off site highways works as a result of this proposal, including improvements to the site access widening along the site access road and at the junction with Station Road, (which shall be constructed as a Heavy Duty Crossover), and the details of Yellow Box road markings adjacent to the site access.**

**(ii) Construction Training: Either a construction training scheme delivered during the construction phase of the development or a financial contribution of £35,000**

**(iii) Air Quality: The applicant provides a financial contribution in the sum of £12,500.**

**(iv) Affordable Housing including a review mechanism**

**(v) Project Management and Monitoring Fee: a contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement.**

**B) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparation of the Section 106 and 278 Agreements and any abortive work as a result of the agreement not being completed.**

**C) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.**

**D) That if any of the heads of terms set out above have not been agreed and the S106 legal agreement has not been finalised by 7th. April 2015, or any other period deemed appropriate by the Head of Planning and Enforcement, then the application may be referred back to the Committee for determination.**

**E) That subject to the above, the application be deferred for determination by the Head of Planning and Enforcement under delegated powers, subject to the completion of the legal agreement under Section 106 of the Town and Country Planning Act 1990 and other appropriate powers with the applicant.**

**F) That if the application is approved, the following conditions be imposed:**

**1 T8 Time Limit - full planning application 3 years**

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

**REASON**

To comply with Section 91 of the Town and Country Planning Act 1990.

**2 RES4 Accordance with Approved Plans**

The development hereby permitted shall not be carried out except in complete

accordance with the details shown on the submitted plans, numbers

1105 PA 002 Rev. A  
1105 PA 003 Rev. B  
1105 PA 001  
1105 PA 010 Rev. E  
1105 PA 010 (fe) Rev. C  
1105 PA 011 Rev. C  
1105 PA 012 Rev. B  
1105 PA 013 Rev. C  
1105 PA 014 Rev. C  
1105 PA 015 Rev. B  
1105 PA 016 Rev. B  
1105 PA 039 Rev. A  
1105 PA 020 Rev. B  
1105 PA 021 Rev. C  
1105 PA 030 Rev. B  
1105 PA 022 Rev. B  
1105 PA 031 Rev. B  
1105 PA 032 Rev. A  
1105 PA 033 Rev. A  
1105 PA 039 Rev. A  
1105 PA 040  
1105 PA 041  
1105 PA 042  
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and shall thereafter be retained/maintained for as long as the development remains in existence.

#### REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (July 2011).

### **3 RES6 Levels**

No development shall take place until plans of the site showing the existing and proposed ground levels and the proposed finished floor levels of all proposed buildings have been submitted to and approved in writing by the Local Planning Authority. Such levels shall be shown in relation to a fixed and known datum point. Thereafter the development shall not be carried out other than in accordance with the approved details.

#### REASON

To ensure that the development relates satisfactorily to adjoining properties in accordance with policy BE13 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

### **4 RES7 Materials (Submission)**

No development shall take place until details of all materials and external surfaces, have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include information relating to:

- (i) fenestration and doors
- (ii) balconies including obscure screening (where applicable)
- (iii) boundary walls and railings
- (iv) comprehensive colour scheme for all built details
- (v) make, product/type, colour and photographs/images.

#### REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy BE13 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

### **5 RES8 Tree Protection**

No site clearance or construction work shall take place until the details have been submitted to, and approved in writing by, the Local Planning Authority with respect to:

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.
2. Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details. The fencing shall be retained in position until development is completed.

The area within the approved protective fencing shall remain undisturbed during the course of the works and in particular in these areas:

- 2.a There shall be no changes in ground levels;
- 2.b No materials or plant shall be stored;
- 2.c No buildings or temporary buildings shall be erected or stationed.
- 2.d No materials or waste shall be burnt; and
- 2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

#### REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with policy BE38 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

### **6 RES10 Tree to be retained**

Trees, hedges and shrubs shown to be retained on the approved plan(s) shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during (or after) construction, or is found to be seriously diseased or dying, another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of

remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'

Remedial work should be carried out to BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

#### REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy BE38 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and to comply with Section 197 of the Town and Country Planning Act 1990.

### **7 RES11 Play Area provision of details**

No development shall commence until details of play areas for children have been submitted to and approved in writing by the Local Planning Authority. Thereafter, the play areas shall be provided prior to the occupation of any unit within the development and maintained for this purpose.

#### REASON

To ensure that the development makes adequate provision of children's play space in accordance with Policy R1 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and London Plan (July 2011) Policy 3.16.

### **8 RES9 Landscaping (car parking & refuse/cycle storage)**

No development shall take place until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

#### 1. Details of Soft Landscaping

- 1.a Planting plans (at not less than a scale of 1:100),
- 1.b Written specification of planting and cultivation works to be undertaken,
- 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

#### 2. Details of Hard Landscaping

- 2.a Refuse Storage
- 2.b Cycle Storage (31 secure spaces for the flats)
- 2.c Means of enclosure/boundary treatments
- 2.d Car Parking Layouts for 49 vehicles, including 5 disabled parking bays and demonstration that 20 of the parking spaces (10 active and 10 passive) are served by electrical charging points and parking for 5 motor cycles.
- 2.e Hard Surfacing Materials
- 2.f External Lighting
- 2.g Other structures (such as play equipment and furniture)

#### 3. Living Walls and Roofs

- 3.a Details of the inclusion of living walls and roofs
- 3.b Justification as to why no part of the development can include living walls and roofs

4. Details of Landscape Maintenance

4.a Landscape Maintenance Schedule for a minimum period of 5 years.

4.b Proposals for the replacement of any tree, shrub, or area of surfacing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

5. Schedule for Implementation

6. Other

6.a Existing and proposed functional services above and below ground

6.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies BE13, BE38 and AM14 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (July 2011).

**9 RES12 No additional windows or doors**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that Order with or without modification), no additional windows, doors or other openings shall be constructed in the walls or roof slopes of the houses on plots 32 to 43 hereby approved.

REASON

To prevent overlooking to the adjoining properties in accordance with policy BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**10 RES13 Obscure Glazing**

The first and second floor bathroom windows of units 32 to 35 facing the Yiewsley and West Drayton Community Centre and the first and second floor landing windows in plots 32 to 43 shall be glazed with permanently obscured glass and non-opening below a height of 1.8 metres taken from internal finished floor level for so long as the development remains in existence.

REASON

To prevent overlooking to adjoining properties in accordance with policy BE24 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**11 NONSC Fenestration Details**

Notwithstanding the submitted plans, details of the first floor oriel bedroom windows to plots 32 to 35 and screen fencing to the upper terrace of plot 32 facing the Yewsley and West Drayton Community Centre shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON

To ensure that the development presents a satisfactory appearance and to prevent overlooking to adjoining properties in accordance with Policies BE13 and BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**12 RES14 Outbuildings, extensions and roof alterations**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that Order with or without modification); no garages, sheds or other outbuildings, nor extension or roof alteration to any dwellinghouses shall be erected without the grant of further specific permission from the Local Planning Authority.

**REASON**

To protect the character and appearance of the area and amenity of residential occupiers, in accordance with policies BE4, BE13, BE21, BE23 and BE24 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**13 RES15 Sustainable Water Management (changed from SUDS)**

No development approved by this permission shall be commenced until a scheme for the provision of sustainable water management has been submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate that sustainable drainage systems (SUDS) have been incorporated into the designs of the development in accordance with the hierarchy set out in accordance with Policy 5.15 of the London Plan and will:

- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- ii. include a timetable for its implementation; and
- iii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:
- iv. provide details of water collection facilities to capture excess rainwater;
- v. provide details of how rain and grey water will be recycled and reused in the development.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

**REASON**

To ensure the development does not increase the risk of flooding in accordance with Policy OE8 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and London Plan (July 2011) Policy 5.12.

**14 RES16 Code for Sustainable Homes**

The residential units shall achieve Level 4 of the Code for Sustainable Homes. No development shall commence until a signed design stage certificate confirming this level has been received. The design stage certificate shall be retained and made available for inspection by the Local Planning Authority on request.

The development must be completed in accordance with the principles of the design stage certificate and the applicant shall ensure that completion stage certificate has been attained prior to occupancy of each dwelling.

**REASON**

To ensure that the objectives of sustainable development identified in London Plan (July 2011) Policies 5.1 and 5.3.



**15 RES18 Lifetime Homes/Wheelchair Units**

All residential units within the development hereby approved shall be built in accordance with 'Lifetime Homes' Standards. Further 10% of the units hereby approved shall be designed and constructed to be fully wheelchair accessible or easily adaptable for residents who are wheelchair users, as set out in the Council's Supplementary Planning Document 'Accessible Hillingdon'.

**REASON**

To ensure that sufficient housing stock is provided to meet the needs of disabled and elderly people in accordance with London Plan (July 2011) Policies 3.1, 3.8 and 7.2.

**16 RES19 Ecology**

Prior to commencement of development an ecological enhancement scheme based on the recommendations contained in the submitted Tree Assessment for Bats and Arboricultural Survey Report dated May 2014, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly detail measures to promote and enhance wildlife opportunities within the landscaping and the fabric of the buildings. These shall include, living screens against walls of the development, bat and bird boxes, habitat walls and a range of plants to encourage and support wildlife. The scheme shall aim to include an area of land dedicated to wildlife habitat. The development shall proceed in accordance with the approved scheme.

**REASON**

In order to encourage a wide diversity of wildlife on the existing semi-natural habitat of the site in accordance with policy EC5 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and London Plan (July 2011) Policy 7.19.

**17 RES20 Traffic Arrangements - submission of details**

Development shall not begin until details of all traffic arrangements (including where appropriate carriageways, footways, turning space, safety strips, sight lines at road junctions, kerb radii, car parking areas and marking out of spaces, loading facilities, closure of existing access and means of surfacing) have been submitted to and approved in writing by the Local Planning Authority. The approved development shall not be occupied until all such works have been constructed in accordance with the approved details. Thereafter, the parking areas, sight lines and loading areas must be permanently retained and used for no other purpose at any time. Disabled parking bays shall be a minimum of 4.8m long by 3.6m wide, or at least 3.0m wide where two adjacent bays may share an unloading area.

**REASON**

To ensure pedestrian and vehicular safety and convenience and to ensure adequate off-street parking, and loading facilities in compliance with Policy AM14 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Chapter 6 of the London Plan (July 2011).

**18 RES22 Parking Allocation**

No unit hereby approved shall be occupied until a parking allocation scheme has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter the parking shall remain allocated for the use of the units in accordance with the approved scheme and remain under this allocation for the life of the development.

**REASON**

To ensure that an appropriate level of car parking provision is provided on site in

accordance with Policy AM14 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and Chapter 6 of the London Plan . (July 2011).

**19 RES23 Visibility Splays - Pedestrian**

The access for the proposed car parking shall be provided with those parts of 2.4m x 2.4m pedestrian visibility splays which can be accommodated within the site in both directions and shall be maintained free of all obstacles to the visibility between heights of 0.6m and 2.0m above the level of the adjoining highway.

**REASON**

In the interests of highway and pedestrian safety in accordance with policy AM7 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**20 RES24 Secured by Design**

The dwellings shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No dwelling shall be occupied until accreditation has been achieved for that dwelling.

**REASON**

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000, to reflect the guidance contained in the Council's SPG on Community Safety By Design and to ensure the development provides a safe and secure environment in accordance with London Plan (July 2011) Policies 7.1 and 7.3.

**21 RES25 No floodlighting**

No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of light sources and intensity of illumination. Any lighting that is so installed shall not thereafter be altered other than for routine maintenance which does not change its details.

**REASON**

To safeguard the amenity of surrounding properties and to protect the ecological value of the area in accordance with policies BE13, OE1 and EC3 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**22 RES26 Contaminated Land**

(i) The development hereby permitted shall not commence until a scheme to deal with contamination has been submitted in accordance with the Supplementary Planning Guidance on Land Contamination and approved by the Local Planning Authority (LPA). The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;

(b) A site investigation, including where relevant soil, soil gas, surface and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly

identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use.

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement.

(ii) If during development or works contamination not addressed in the submitted remediation scheme is identified, an addendum to the remediation scheme must be agreed with the LPA prior to implementation; and

(iii) All works which form part of the remediation scheme shall be completed and a verification report submitted to the Council's Environmental Protection Unit before any part of the development is occupied or brought into use unless the LPA dispenses with any such requirement specifically and in writing.

(iv) Before any part of the development is occupied, site derived soils and imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

**REASON:**

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy OE11 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

**23 RES5 General compliance with supporting documentation**

The development hereby permitted shall not be occupied until the following has been completed in accordance with the specified supporting plans and/or documents:

- Sustainability Report Revision 2 dated 27th May 2014
- Code for Sustainable Homes Certificate to Level 4
- 1105 RP FWDPS Lifetime Homes & Wheelchair Housing Appraisal. Wheelchair Units
- Tree Assessment for Bats
- Sound insulation in accordance with Section 6 of the Noise Impact Assessment Report 11221.NIA.01 dated 29th May 2014
- Air quality Assessment dated June 2014

Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence.

**REASON**

To ensure the development complies with the provisions of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and the London Plan (July 2011).

**24 NONSC Plant and Machinery**

Before the development is commenced details of any plant, machinery and fuel burnt, as part of the energy provision and the location of the flue at the development shall be submitted to the Local Planning Authority for approval. This shall include pollutant emission rates at the flue with or without mitigation technologies. The use of ultra low NOx emission gas-fired CHPs and boilers is recommended. The development should as a minimum be 'air quality neutral' and demonstrably below the building emissions benchmark.

## REASON

To safeguard the amenity of neighbouring properties in accordance with policy OE1 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

## INFORMATIVES

### **1            I1                    Building to Approved Drawing**

You are advised this permission is based on the dimensions provided on the approved drawings as numbered above. The development hereby approved must be constructed precisely in accordance with the approved drawings. Any deviation from these drawings requires the written consent of the Local Planning Authority.

### **2            I11                    The Construction (Design and Management) Regulations 1994**

The development hereby approved may be subject to the Construction (Design and Management) Regulations 1994, which govern health and safety through all stages of a construction project. The regulations require clients (ie. those, including developers, who commission construction projects) to appoint a planning supervisor and principal contractor who are competent and adequately resourced to carry out their health and safety responsibilities. Further information is available from the Health and Safety Executive, Rose Court, 2 Southwark Bridge Road, London, SE1 9HS (telephone 020 7556 2100).

### **3            I12                    Notification to Building Contractors**

The applicant/developer should ensure that the site constructor receives copies of all drawings approved and conditions/informatives attached to this planning permission. During building construction the name, address and telephone number of the contractor (including an emergency telephone number) should be clearly displayed on a hoarding visible from outside the site.

### **4            I13                    Asbestos Removal**

Demolition and removal of any material containing asbestos must be carried out in accordance with guidance from the Health and Safety Executive and the Council's Environmental Services. For advice and information contact: - Environmental Protection Unit, 3S/02, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 277401) or the Health and Safety Executive, Rose Court, 2 Southwark Bridge Road, London, SE1 9HS (Tel. 020 7556 2100).

### **5            I15                    Control of Environmental Nuisance from Construction Work**

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance 'The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit ([www.hillingdon.gov.uk/noise](http://www.hillingdon.gov.uk/noise) Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

**6 117 Communal Amenity Space**

Where it is possible to convey communal areas of landscaping to individual householders, the applicant is requested to conclude a clause in the contract of the sale of the properties reminding owners of their responsibilities to maintain landscaped areas in their ownership and drawing to their attention the fact that a condition has been imposed to this effect in this planning permission.

**7 118 Storage and Collection of Refuse**

The Council's Waste Service should be consulted about refuse storage and collection arrangements. Details of proposals should be included on submitted plans.

For further information and advice, contact - the Waste Service Manager, Central Depot - Block A, Harlington Road Depot, 128 Harlington Road, Hillingdon, Middlesex, UB8 3EU (Tel. 01895 277505 / 506).

**8 119 Sewerage Connections, Water Pollution etc.**

You should contact Thames Water Utilities and the Council's Building Control Service regarding any proposed connection to a public sewer or any other possible impact that the development could have on local foul or surface water sewers, including building over a public sewer. Contact: - The Waste Water Business Manager, Thames Water Utilities plc, Kew Business Centre, Kew Bridge Road, Brentford, Middlesex, TW8 0EE.

Building Control Service - 3N/01, Civic Centre, High Street, Uxbridge, UB8 1UW (tel. 01895 250804 / 805 / 808).

**9 12 Encroachment**

You are advised that if any part of the development hereby permitted encroaches by either its roof, walls, eaves, gutters, or foundations, then a new planning application will have to be submitted. This planning permission is not valid for a development that results in any form of encroachment.

**10 121 Street Naming and Numbering**

All proposed new street names must be notified to and approved by the Council. Building names and numbers, and proposed changes of street names must also be notified to the Council. For further information and advice, contact - The Street Naming and Numbering Officer, Planning & Community Services, 3 North Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250557).

**11 124 Works affecting the Public Highway - General**

A licence must be obtained from the Highway Authority before any works are carried out on any footway, carriageway, verge or other land forming part of the public highway. This includes the erection of temporary scaffolding, hoarding or other apparatus in connection with the development for which planning permission is hereby granted. For further information and advice contact: - Highways Maintenance Operations, 4W/07, Civic Centre, Uxbridge, UB8 1UW

**12**        I43                    **Keeping Highways and Pavements free from mud etc**

You are advised that care should be taken during the building works hereby approved to avoid spillage of mud, soil or related building materials onto the pavement or public highway. You are further advised that failure to take appropriate steps to avoid spillage or adequately clear it away could result in action being taken under the Highways Act 1980.

**13**        I25A                    **The Party Wall etc. Act 1996**

On 1 July 1997, a new act, The Party Wall etc. Act 1996, came into force.

This Act requires a building owner to notify, and obtain formal agreement from, any adjoining owner, where the building owner proposes to:-

- 1) carry out work to an existing party wall;
- 2) build on the boundary with a neighbouring property;
- 3) in some circumstances, carry out groundworks within 6 metres of an adjoining building.

Notification and agreements under this Act are the responsibility of the building owner and are quite separate from Building Regulations or planning controls. Building Control will assume that an applicant has obtained any necessary agreements with the adjoining owner, and nothing said or implied by Building Control should be taken as removing the necessity for the building owner to comply fully with the Act.

**14**        I3                        **Building Regulations - Demolition and Building Works**

Your attention is drawn to the need to comply with the relevant provisions of the Building Regulations, the Building Acts and other related legislation. These cover such works as - the demolition of existing buildings, the erection of a new building or structure, the extension or alteration to a building, change of use of buildings, installation of services, underpinning works, and fire safety/means of escape works. Notice of intention to demolish existing buildings must be given to the Council's Building Control Service at least 6 weeks before work starts. A completed application form together with detailed plans must be submitted for approval before any building work is commenced. For further information and advice, contact - Residents Services, Building Control, 3N/01 Civic Centre, Uxbridge (Telephone 01895 250804 / 805 / 808).

**15**        I32                    **Trees in a Conservation Area**

As the application site is within a conservation area, not less than 6 weeks notice must be given to the Local Planning Authority of any intention to cut down, top, lop or uproot or otherwise damage or destroy any trees on the application site. Please contact the Trees & Landscape Officer, Residents Services, 3N/02, Civic Centre, Uxbridge, UB8 1UW for further advice.

**16**        I47                    **Damage to Verge - For Council Roads:**

The Council will recover from the applicant the cost of highway and footway repairs, including damage to grass verges.

Care should be taken during the building works hereby approved to ensure no damage occurs to the verge or footpaths during construction. Vehicles delivering materials to this development shall not override or cause damage to the public footway. Any damage will require to be made good to the satisfaction of the Council and at the applicant's expense.

For further information and advice contact - Highways Maintenance Operations, Central Depot - Block K, Harlington Road Depot, 128 Harlington Road, Hillingdon, Middlesex, UB3 3EU (Tel: 01895 277524).

**17**        I49                    **Secured by Design**

The Council has identified the specific security needs of the application site to be: CCTV and boundary treatments. You are advised to submit details to overcome the specified security needs in order to comply with condition 20 of this planning permission.

**18**        I52                    **Compulsory Informative (1)**

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

**19**        I53                    **Compulsory Informative (2)**

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (July 2011) and national guidance.

AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE1	Development within archaeological priority areas
BE4	New development within or on the fringes of conservation areas
BE10	Proposals detrimental to the setting of a listed building
BE11	Proposals for the demolition of statutory listed buildings
BE13	New development must harmonise with the existing street scene.
BE19	New development must improve or complement the character of the area.
BE20	Daylight and sunlight considerations.
BE21	Siting, bulk and proximity of new buildings/extensions.
BE23	Requires the provision of adequate amenity space.
BE24	Requires new development to ensure adequate levels of privacy to neighbours.
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE8	Planning applications for alteration or extension of listed buildings
EC2	Nature conservation considerations and ecological assessments
EC5	Retention of ecological features and creation of new habitats
H4	Mix of housing units
H5	Dwellings suitable for large families
H8	Change of use from non-residential to residential

OE1	Protection of the character and amenities of surrounding properties and the local area
OE5	Siting of noise-sensitive developments
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
R11	Proposals that involve the loss of land or buildings used for education, social, community and health services
HDAS-LAY	Residential Layouts, Hillingdon Design & Access Statement, Supplementary Planning Document, adopted July 2006
LDF-AH	Accessible Hillingdon , Local Development Framework, Supplementary Planning Document, adopted January 2010
LPP 5.1	(2011) Climate Change Mitigation
LPP 5.12	(2011) Flood risk management
LPP 5.13	(2011) Sustainable drainage
LPP 6.13	(2011) Parking
LPP 7.14	(2011) Improving air quality
LPP 7.8	(2011) Heritage assets and archaeology
LPP 8.2	(2011) Planning obligations
LPP 8.3	(2011) Community infrastructure levy
NPPF	National Planning Policy Framework

## **20            159                    Councils Local Plan : Part 1 - Strategic Policies**

On this decision notice policies from the Councils Local Plan: Part 1 - Strategic Policies appear first, then relevant saved policies (referred to as policies from the Hillingdon Unitary Development Plan - Saved Policies September 2007), then London Plan Policies. On the 8th November 2012 Hillingdon's Full Council agreed the adoption of the Councils Local Plan: Part 1 - Strategic Policies. Appendix 5 of this explains which saved policies from the old Unitary Development (which was subject to a direction from Secretary of State in September 2007 agreeing that the policies were 'saved') still apply for development control decisions.

## **21            16                            Property Rights/Rights of Light**

Your attention is drawn to the fact that the planning permission does not override property rights and any ancient rights of light that may exist. This permission does not empower you to enter onto land not in your ownership without the specific consent of the owner. If you require further information or advice, you should consult a solicitor.

## **22**

In accordance with the provisions of the NPPF, the Local Planning Authority has actively engaged with the applicant both at the pre application and application stage of the planning process, in order to achieve an acceptable outcome. The Local Planning Authority has worked proactively with the applicants to secure a development that improves the economic, social and environmental conditions of the area. In assessing and determining the development proposal, the Local Planning Authority has applied the presumption in favour of sustainable development Accordingly, the planning application has been recommended for approval.

## **23**

In the event that works to the access road reveal human remains, they must be handled in



accordance with the relevant provisions of The Burial Grounds Act 1857.

## **24**

You are advised that the development hereby approved represents chargeable development under the Mayor's Community Infrastructure Levy. At this time the Community Infrastructure Levy is estimated to be £137,206.28, which is due on commencement of this development. The actual Community Infrastructure Levy will be calculated at the time your development is first permitted and a separate liability notice will be issued by the Local Planning Authority.

In addition, the development hereby approved represents chargeable development under the Hilligdon Community Infrastructure Levy. At this time the Community Infrastructure Levy is estimated to be 350,417.72. Should you require further information please refer to the Council's Website [www.hillingdon.gov.uk/index.jsp?articleid=24738](http://www.hillingdon.gov.uk/index.jsp?articleid=24738)

### **3. CONSIDERATIONS**

#### **3.1 Site and Locality**

The application relates to the former West Drayton Police Station which is currently unoccupied. The site is occupied by a three storey former police station, a 1960's building which is set back some way from the main road and part-concealed behind two tree belts. Single and two storey buildings are sited to the rear of the main Police Station. The front of the site comprises an area of grass land with various trees and shrubs and an access road leading up to the main building. The rear of the site which has been used as a car park since the 1960's is mainly hard surfaced and bordered by high boundary fencing and a listed wall. Part of the southern boundary is formed by existing out buildings. The front boundary with Station Road is planted with large conifer trees. Trees on the site and nearby are not protected by TPO but are afforded protection by virtue of their location within the West Drayton Conservation Area. There is a fall in levels from east to west from Station Road to the main building of approximately 2 and a half metres.

The surrounding area is characterised by a mixture of two and three storey buildings, which are mainly residential, with a range of commercial uses at street level opposite the site. These buildings are predominantly 1930's style with brick, pebble dash and painted rendered walls and clay tiled roofs.

To the south of the site is the Yiewsley and West Drayton Community Centre, whilst to the north is the statutory Grade 2 listed Drayton Hall, set in extensive grounds.

The site falls within the West Drayton Green Conservation Area and the proposed Colne Valley Archaeological Priority Area.

#### **3.2 Proposed Scheme**

Planning permission is sought for the erection of a four storey block at the front of the site containing 31 flats, 6 pairs of semi detached 3 storey town houses at the rear of the site, together with associated car parking, access and landscaping. A summary of the mix of housing is set out in the following accommodation schedule:

Type of Accommodation

1 bed 2 person: flats x 1  
1 bed 2 person + study flats x 5  
2 bed 3 person flats (standard) x 6  
2 bed 3 person flats (larger) x 14  
1 bed 2 person wheelchair flats x 1  
1 bed 2 person + study wheelchair flat x 1  
2 bed 3 person wheelchair flats x 2  
3 bed 5 person houses: x 11  
4 bed 6 person houses: x 1

The development would retain the open area in front of the site providing amenity space for residents of the proposed apartments, together with a children's play area.

Access to the site would be via Station Road, utilising the existing access arrangement. The single access road would run through the site providing access to the flats as well as the houses located to the rear. The remaining areas would be retained or returned to soft landscaping as private amenity spaces for the occupants of the development.

The 12 houses would be served by 19 car parking spaces generally situated to the front of the residential units to which they serve, with landscaping. The 31 flats would be served by 30 car parking spaces including 27 spaces within a lower ground floor car park. There is also provision for 24 cycle spaces in this lower ground floor car park and 9 at ground floor level. The proposal will involve the demolition of all the existing buildings on the site.

The application is supported by a number of reports that assess the impact of the proposal. A summary and some key conclusions from these reports are provided below:

- Planning Statement

The statement describes the development and provides a policy context and planning assessment for the proposal. The statement concludes that the proposal is well conceived, robust and in accordance with the proper planning of the area.

- Heritage Statement

This statement sets out the history of the site and provides a context of the development in relation to the nearby Drayton Hall (Grade 2 listed) and the West Drayton Green Conservation Area, together with commentary on the listed garden walls at the rear of the site (part retained).

- Design and Access Statement

This report outlines the context for the development and provides a justification for the design, number of units, layout, scale, landscaping, appearance and access for the proposed development.

- Arboricultural survey

The statement has been prepared to ensure good practise in the protection of trees during the construction and post construction phases of the development.

- Energy Statement and Sustainability Statement

The sustainability credentials of the scheme are assessed in respect of renewable energy resources and achieving savings in terms of CO2. The assessment concludes that the use of Photo Voltaic panels is the preferred option for renewable energy technology.

- Biodiversity Survey and Report

The report summarises the findings of a walk over survey, desk study and protected species assessment. Recommendations for protected species surveys have been made.

- Noise Impact Assessment

The assessment concludes that the site is suitable for residential development subject to a suitable scheme of mitigation measures being incorporated into the design.

- Transport Assessment

The assessment considers the accessibility of the site, examines predicted generation trips by all modes, assesses the effect of the development on surrounding transport infrastructure and considers surfacing and refuse collection facilities. The assessment concludes that the development benefits from good levels of public transport accessibility, that net trip generation can be accommodated on the surrounding transport infrastructure and that the development through its design, will encourage the use of sustainable modes of transport.

- Statement of Community Involvement

The document summarises the consultation strategy with statutory and non statutory consultees, including local politicians, local community groups and neighbours.

- An Archaeological Evaluation

The report concludes that there was no evidence that the Post Medieval cemetery beside Drayton Hall extended south into the northern extent of the site.

### **3.3 Relevant Planning History**

#### **Comment on Relevant Planning History**

None.

## **4. Planning Policies and Standards**

### **UDP / LDF Designation and London Plan**

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.H1 (2012) Housing Growth
- PT1.H2 (2012) Affordable Housing
- PT1.HE1 (2012) Heritage

Part 2 Policies:

AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM2	Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity
AM7	Consideration of traffic generated by proposed developments.
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE1	Development within archaeological priority areas
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BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE8	Planning applications for alteration or extension of listed buildings
EC2	Nature conservation considerations and ecological assessments
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H4	Mix of housing units
H5	Dwellings suitable for large families
H8	Change of use from non-residential to residential
OE1	Protection of the character and amenities of surrounding properties and the local area
OE5	Siting of noise-sensitive developments
OE7	Development in areas likely to flooding - requirement for flood protection measures
OE8	Development likely to result in increased flood risk due to additional surface water run-off - requirement for attenuation measures
R11	Proposals that involve the loss of land or buildings used for education, social, community and health services
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LPP 7.8	(2011) Heritage assets and archaeology
LPP 8.2	(2011) Planning obligations
LPP 8.3	(2011) Community infrastructure levy
NPPF	National Planning Policy Framework

## 5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **1st July 2014**

5.2 Site Notice Expiry Date:- Not applicable

## 6. Consultations

### External Consultees

The application has been advertised under Article 13 of the Town and Country Planning General Development Management Order 2010 as a Major Development. The application has been advertised as a development that affects the character and appearance of the West Drayton Green Conservation

Area and the setting of the Grade 2 listed building, Drayon Hall.

106 surrounding property owners/occupiers have been consulted. At the time of writing the report, 6 letters have been received objecting to the proposal. The contents are summarised below:

- Will the block of flats be laid back from the main road and are the trees adjacent to the road way going to remain and where will the entrance be located?
- I am concerned about safety and security to my property. Will you provide anti-climb facilities or security so my garden cannot be entered by residents?
- Will flats or top windows be over looking into my property?
- Will this be a private housing estate or council?
- Will building work be carried out during and throughout the evening?
- I have grave concerns at yet more homes being built in this area without the supporting infrastructure. Almost every primary school in the borough is already being enlarged and there is currently no local secondary school in West Drayton.
- My biggest concern is the deterioration of the service provided by the existing local doctors.
- I am all for sites such as these being developed but such a densely populated area needs a police station
- Planners cannot keep adding dwellings without providing services and taking into account the impact on local roads.
- I am pleased to see that houses are being provided but there are far too many children living in flats with no gardens
- This is a conservation area and the surrounding areas are already saturated with new housing developments making the area too congested.

### ENGLISH HERITAGE (GLAAS)

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8)

emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision.

Appraisal of this planning application using the Greater London Historic Environment Record and information submitted with the application indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.

This application lies within the Colne Valley Archaeological Priority Area on the edge of West Drayton village and its burial ground and in the former grounds of Drayton Hall. However, it is only supported by a cursory 'Heritage Statement' which is not compliant with the NPPF as it does not reference the Historic Environment Record nor does it assess the site's archaeological interest nor has it used the full range of sources which would be expected of an archaeological desk based assessment.

I therefore recommend that the following further studies should be undertaken to inform the preparation of proposals and accompany a planning application:

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development. Once the archaeological impact of the proposal has been defined a recommendation will be made by GLAAS.

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation.

If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development. If a planning decision is to be taken without the provision of sufficient archaeological information then we recommend that the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal.

#### Desk Based Assessment

Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures.

#### Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development. Once the archaeological impact of the proposal has been defined a recommendation will be made by GLAAS.

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation.

If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development. If a planning decision is to be taken without the provision of sufficient archaeological information then we recommend that the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal.

Further information on archaeology and planning in Greater London is available at:  
<http://www.english-heritage.org.uk/professional/advice/our-planning-role/greaterlondon-archaeology-advisory-service/about-glaas/>

Please note that this advice relates solely to archaeological considerations. If necessary, English Heritage's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

Further comments (26/2/2015)

I have now received an archaeological trial trench evaluation report on the above site. Having considered the report, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest because most of the land has been shown to have been quarried, probably in the early 19th century. Remains of later 19th century brick garden buildings were found in one trench but these were only heavily truncated foundations of negligible interest. Historic maps indicated that the existing site access road had probably encroached upon the 'Old grave Yard' of St. Martins Church - this is referred to in the Victoria County History of Middlesex as: "A new graveyard, given in exchange by Sir William Paget in 1550, continued in use until 1888. It lay off the Harmondsworth Road, in the grounds of Drayton Hall." Trial trenching did not find any graves but nor had the land been quarried suggesting that perhaps it was an unused part of the grave yard, alternatively the historic mapping may simply have been imprecise. I understand that it is anyway only intended to re-surface the existing access so I conclude that no further assessment or archaeological conditions are necessary.

However, in the unlikely event that works to the access road do reveal human remains they must be handled in accordance with the relevant provisions of The Burial Grounds Act 1857 - you may wish to add an informative to this effect to any planning consent.

(Officer Comment: Informative attached).

#### WEST DRAYTON CONSERVATION AREA ADVISORY PANEL

We are pleased to see that efforts have been made to design the proposed development to fit around the listed walls on the site. We also approve of the decision to site the block of flats towards the road frontage, and therefore as far away as possible from Drayton Hall. The site will not have as open an aspect as it currently does, but given the pressures for high-density development we consider a reasonably acceptable balance has been struck. The retention of the mature trees is key to the acceptability of the proposals, and we hope that where appropriate new trees will be planted so a succession is built up to allow for the inevitable death of mature trees as they reach the ends of their lives. The only feature of the plans that concerns us is the proposal to use the excavated material from under the block of flats to raise the level of the open land next to the road. We believe that the burial ground extends into this area and hope that adequate enquiries will be made (perhaps of the local history society) to confirm or deny it. If part of the site is a historic burial ground we would not like to see it covered with the depth of soil the present landscaping plans

propose

## WARD COUNCILLOR

Concerns have been expressed by local residents on the above development within the Conservation Area. The design of the block of flats continues to give an austere appearance, not in keeping with the surrounding area, whilst the new semi-detached buildings are indeed very different from anything else in the immediate area. The site of the development can be seen easily from the public road, and therefore would not have a minimal impact on the Conservation Area. The site area is surrounded on the rear northern boundary by a listed wall, which continues around part of the western boundary.

This wall is likely to be a legacy from when the nearby Drayton Hall was once the seat of the De Burgh family. The development has therefore not taken the opportunity of using the long history of the site, and its prominent place within the Conservation area within the design of the 43 residences. In addition, the loss of 11 of the 35 trees on the site is of concern in an Air Quality Management Area.

Although the 12 semi detached houses will be well served by the 24 car parking spaces, the other 31 flats will not be so well accommodated. A reduction of 3 car parking spaces from the existing provision will mean that some problems with parking will be experienced by some residents within the flats. The additional accommodation in the area will mean even more pressure on local services, including school places, recreation facilities, health facilities. It is therefore necessary that if Members approve the scheme, a Section 106 or a CIL will need to be used to provide support for all these areas of need in the local area.

### **Internal Consultees**

#### URBAN DESIGN/CONSERVATION OFFICER

The site lies in the West Drayton Green Conservation Area, close to the grade II listed West Drayton Hall and within both a proposed APA and APZ. The old garden walls within the site are considered as curtilage listed to the Hall.

GLAAS need to be consulted on this application and may require further work to be undertaken on the archaeology of the site.

There are no objections to the demolition of the existing police station and the retention of the historic walls is welcomed. The general layout of the proposal is considered acceptable and there are no objections to a modern approach to the design of the new development. The retention and reinforcement of the existing tree screening on the boundary of the site will be an important element in terms of softening the appearance of the new building and integrating it with the existing context.

#### ENVIRONMENTAL PROTECTION UNIT

##### Air Quality

The application site is located within the Hillingdon AQMA, declared for Nitrogen Dioxide (NO<sub>2</sub>). The air quality assessment has considered the air quality impact at the application site as a receptor only and the operational impacts are judged to be 'minor adverse'. The assessment is reasonably conservative in approach and considers a mean background for the site for 2015 both with and without reductions in traffic emissions. It does not consider the air quality in the area without the development or cumulative impacts from nearby developments. It does not appear to consider car park emissions, and NO<sub>x</sub> emissions from the energy source at the site with regard to NO<sub>2</sub> levels at the facade of the building. However, it does compare the building emission and transport emissions



from the development to the current GLA benchmarks for this type of development.

As the development is in an area already suffering poor air quality, and will not meet the transport emissions benchmark the following is requested:

#### Section 106

Section 106 obligation for £12,500 should be sought for contribution to the air quality monitoring network in the area and improving air quality (see comments below regarding transport emissions benchmark).

CERC modelling carried out for Hillingdon in 2011 indicates at the worst locations at the application site, NO<sub>2</sub> levels are likely to be slightly above the limit value of 40 mg/m<sup>3</sup>, for 2011. The air quality assessment has considered receptor height at 7.5 metres, which represents the second floor level, and exceedances are indicated at all the facade of the flats. This would suggest exceedances are likely from the ground up to the second floor (and likely on the third floor in some instances). The location of the boiler room or flues is not clear, nor is the ventilation details for the underground car park.

The air quality assessment indicates measures to mitigate air quality impacts on the internal environment and the development is considered acceptable in this regard.

The building emissions worked out in the assessment indicates the dwellings will not contain private domestic, gas-fired combination boilers and hot water and heating is supplied centrally. The total NO<sub>x</sub> emissions from the proposed centralised boilers will be 11.5 kg/yr, which is lower than the building emissions benchmark of 94.5 kg/yr, which would suggest the building emissions are 'air quality neutral'. However, it should be noted the plans provided with the application do not indicate the location of the centralised energy provision at the site, and the Sustainability Report (Rev2) dated 27 May 2014 indicates hot water will be provided by highly efficient gas boilers with NO<sub>x</sub> emissions less than 40 mg/kWh and PV. This does not clarify if it will be a few centralised boilers for the whole development or private domestic, gas-fired combination boilers for each residential unit. Clarification is required with regard to this and the following condition is recommended to ensure the building emissions will be below the benchmark for 'air quality neutral'. It should be possible to achieve this.

#### Air Quality Condition 1 - Details of Energy Provision

Before the development is commenced details of any plant, machinery and fuel burnt, as part of the energy provision and the location of the flue at the development shall be submitted to the LPA for approval. This shall include pollutant emission rates at the flue with or without mitigation technologies. The use of ultra low NO<sub>x</sub> emission gas-fired CHPs and boilers is recommended. The development should as a minimum be 'air quality neutral' and demonstrably below the building emissions benchmark.

REASON: To safeguard the amenity of neighbouring properties in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

Notes: This condition relates to the operational phase of residential and commercial development and is intended for the protection of future residents in a designated AQMA and Smoke Control Area. Advice on the assessment of CHPs is available from EPUK at: [http://www.iaqm.co.uk/text/guidance/epuk/chp\\_guidance.pdf](http://www.iaqm.co.uk/text/guidance/epuk/chp_guidance.pdf). An area up to a distance of 10 times the appropriate stack height needs to be assessed. Guidance on air quality neutral is available at: <https://www.london.gov.uk/priorities/planning/consultations/draft-sustainable-design-and-construction>. They should contact Planning Specialists if they have any queries.

The transport emissions benchmark will not be met by the proposed development, which is worked out using the annual trip generation of 43,592 (based on the daily trip estimate of 119.43 in the Transport Statement dated Apr/May 2014). The air quality assessment indicates it is not possible for the development to meet the transport emissions benchmark and be 'air quality neutral' without reducing the annual trip generation to 16,599 trips per year (approximately 45 a day). Mitigation measures with regard to this would need to be considered as part of the development.

No green travel plan has been submitted for the development. It is recommended the travel plan is used to at least partially address this and reduce car use, where it is not a zero or low emission vehicle, and encourage the use of more sustainable modes of travel. The travel plan condition is recommended for any permission that may be given, with a target to reduce trip generation. It is also recommended the electric charging point parking areas be limited for the use of electric vehicles only and if possible it should be extended to include parking for zero/low emission vehicles provided as part of a car club.

The GLA have outlined possible means of getting funding for abatement and or offsetting costs where the development is not 'air quality neutral'. It is not quite clear how this could be implemented within the Council at present. In the absence of a mechanism within the Council to address this, a request for the full s106 contribution for air quality is recommended, as it seems unlikely the full 62 percent reduction in trips from the development is achievable. We could potentially request £30K on a per tonne of excess NOx, based on the damage cost approach as set out in the air quality assessment.

#### Land Contamination

No information has been submitted with the application regarding land contamination. The design and access statement indicates a contamination desk study will be undertaken prior to development and the application correctly indicates the proposed use would be particularly vulnerable to the presence of contamination. The standard contaminated land condition is recommended for inclusion in any permission given. The soils condition is also recommended, and soil testing needs to be carried out to demonstrate the development is suitable for use. It is noted for the flats that a basement car park is proposed, but the area identified as being potentially contaminated is the car park, which will have houses with private gardens as a consequence of the development. The site investigation information should be provided as soon as possible.

#### Contaminated Land Condition

(i) The development hereby permitted shall not commence until a scheme to deal with contamination has been submitted in accordance with the Supplementary Planning Guidance Document on Land Contamination and approved by the Local Planning Authority (LPA). The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;

(b) A site investigation, including where relevant soil, soil gas, surface and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with details of a watching brief to address undiscovered contamination.

(ii) If during development works contamination not addressed in the submitted remediation scheme is identified, the updated watching brief shall be submitted and an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) All works which form part of the remediation scheme shall be completed and a comprehensive verification report shall be submitted to the Council's Environmental Protection Unit before any part of the development is occupied or brought into use unless the LPA dispenses with any such requirement specifically and in writing.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy OE11 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

The following condition needs to be included in any permission given to ensure the soils are suitable for use, if any areas of soft landscaping or planting are created as part of the development.

Condition to minimise risk of contamination from garden and landscaped areas

Before any part of the development is occupied, site derived soils and imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

Note: The Environmental Protection Unit (EPU) must be consulted for their advice when using this condition.

#### REASON

To ensure that the occupants of the development are not subject to any risks from soil contamination in accordance with policy OE11 of the Hillingdon Unitary Development Plan Saved Policies (September 2007).

#### ACCESS OFFICER

The Site is located within the West Drayton Green Conservation area close to Drayton Hall. Planning permission is sought to demolish the former West Drayton Police Station to make way for a range of residential units comprising flats and houses. The flats would be located at the front of the site, and the houses at the rear. The houses would each be provided with two parking spaces and the flats one space.

A Lifetime Homes & Wheelchair Housing Appraisal has been submitted demonstrating that the development can be built to relevant standards. This can be conditioned in the event of an approval.

#### TREE AND LANDSCAPE OFFICER

LANDSCAPE CHARACTER / CONTEXT: The site is occupied by a three storey former police station, a 1960's building which is set back some way from the main road and part-concealed behind two tree belts.

Situated within the former grounds of West Drayton Hall, the site now lies to the south and east of Drayton Hall and its remaining grounds. The front of the site (eastern half) is currently an undeveloped area of grassland with occasional trees. This area is low lying compared with the adjacent boundaries. The old police station and parking area / yard occupies the centre and western part of the site and is surrounded by old brick walls of London stock. There are also some single and

two- storey out- buildings

Trees on the site and nearby are not protected by TPO but are afforded protection by virtue of their location within the West Drayton Conservation Area.

**PROPOSAL:** The proposal is to demolish the existing police station, outbuildings and concrete hard-standing, part retention of the listed walls and the construction of 12 semi-detached houses, together with a 4-storey block of 31 flats, with associated car and cycle parking and access road.

**LANDSCAPE CONSIDERATIONS:** Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

- The Design & Access Statement adheres to the format recommended by CABI. Section 8.0 considers the landscape.
- 8.1 considers the existing landscape elements. It notes the effectiveness of the tree screen along the eastern boundary, the trees lining the access road (north), a 'small cluster of deciduous trees adjoining the boundary to the Community Centre (south) and a number of small trees spaced around the lawn.
- It also notes the presence of off-site trees, within the grounds of Drayton Hall to the north, which contribute to the sense of enclosure on all boundaries.
- 8.2 summarises the findings of the tree survey. 35No. trees have been identified and assessed. 11No. will be removed to facilitate the development, of which 3No. are 'B' category - leaving 15No. 'B' category trees unaffected.
- 8.3 assesses the topographical character of the site and confirms that there is a depression in the site between the front boundary and the front of the police station.
- 8.4 describes the proposal for the front of the site with the tree screen along the road, the northern side of the drive and the group near the community centre boundary all being retained as important boundary features.
- 8.5 explains the design philosophy for the rear of the site. Tree loss will be minimal and 'significant areas' of hard landscaping will be replaced with gardens and communal planted areas. New tree planting will enhance the new road system. It is intended to have open plan front gardens, defining boundaries with planting rather than fences. This is a positive design concept.
- 8.6 and 8.7 explain the access road and the strategy for the boundary treatments.
- Phlorum's Arboricultural Impact Assessment Report considers the quality and value of the trees on site, the impact assessment and provides a method statement.
- The report confirms (3.3) that 40No. trees/groups/hedgerows were surveyed, including those immediately outside the site.
- 2No. trees are category 'A' trees (T12 and G37) , 18No. are category 'B' (G1, T2, T3, T8, T9, T10, T14, T15, T16, T18, T20, T21, T23, H24, T30, T34, T39 and T40) and there are 18No. category 'C'. There is no objection to this assessment.
- Phlorum's drawing No. PJC/3383/14/B, Tree Protection Plan, indicates the locations of the trees to be retained and the setting out of proposed tree protection fencing, the details of which are specified.
- If the application is recommended for approval, landscape conditions should be imposed to ensure that the proposals preserve and enhance the character and local distinctiveness of the surrounding natural and built environment.

**RECOMMENDATIONS:** No objection, subject to the above observations and RES6, RES8 (as submitted), COM9 (parts 1,2,4,5, and 6) and RES10.

SUSTAINABILITY OFFICER

No objections are raised to the proposed development.

#### Energy Comments

The development suitably demonstrates a 40% reduction in CO2 largely through the use of PV panels. The roof plans show these incorporated into the design. I therefore have no need for energy conditions subject to the development being completed in accordance with the submitted energy report.

#### Ecology Comments

The proposed development results in the loss of several trees and although the site is unlikely to have significant value for wildlife, the national planning policy framework requires a net gain in biodiversity value. The loss of trees and general loss of wildlife value requires the final designs to demonstrate a net gain. The following condition is therefore necessary:

#### CONDITION

Prior to commencement of development an ecological enhancement scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall clearly detail measures to promote and enhance wildlife opportunities within the landscaping and the fabric of the buildings. These shall include, living screens against walls of the development, bat and bird boxes, habitat walls and a range of plants to encourage and support wildlife. The scheme shall aim to include an area of land dedicated to wildlife habitat. The development must proceed in accordance with the approved scheme.

#### REASON

To ensure the development contributes to ecological enhancement in accordance with Policy EM7 (Local Plan) and Policy 7.28 of the London Plan.

#### HIGHWAY ENGINEER

The development is for the demolition of the existing police station and the construction of 12 houses (10 x 3 bedroom and 2 x 4 bedroom) and 31 apartments (2 x 1 bedroom and 29 x 2 bedroom). As part of the proposals, 49 car and 43 cycle parking spaces will be provided within the site. Vehicle and pedestrian access to the site will be provided from Station Road via the existing access, which will be widened to accommodate two-way traffic and a yellow box road markings will be provided across the site access.

When reviewing the Transport Statement (TS) submitted in support of the proposals, an assessment of the existing and proposed trip generation at the site has been undertaken using the TRICS Database. However, the assessment is not representative, in part, due to the location of the selected sample sites and the category of the existing use at the site. Nevertheless, it is considered that any increase in vehicle trips as a result of the development, would not have a material impact along the adjacent highway network.

From assessment of the PTAL index within the adjacent area, this has been identified as 2, which is classified as poor. However, it is noted that the site is located directly adjacent to public transport facilities, including bus stops and shelters. In addition, it is noted that West Drayton Rail Station, which will be upgraded as part of the Cross Rail development, is located within the walking distance as recommended by Transport for London. As a result, it is considered that the proposed car parking provision is acceptable to serve the development.

When considering the proposed widening of the existing access to the site, a swept path analysis has been provided within the TS. This has demonstrated that a car and a servicing vehicle will be able to pass side by side when enter and exit the site. However, it is noted that within the site, vehicles will be required to give way where the access road turns at 90°. However, this would not have an impact on the adjacent highway.

Therefore, subject to the details below being provided under a suitably worded planning condition/S106 Agreement, it is considered that the development would not be contrary to the policies of the adopted Hillingdon Local Plan, 2012, (Part 2).

Conditions/S106.

The development shall not commence until details of the proposed widening along the site access road and at the junction with Station Road, (which shall be constructed as a Heavy Duty Crossover), and the details of the Keep Clear road markings adjacent to the site access have been submitted to and approved in writing by the LPA. Thereafter, the development shall not be occupied until all works have been completed.

The parking provision within the site shall include 20% active and 20% passive electric charging points, which shall be provided before first occupation of the development.

The development shall not be occupied until details of the proposed cycle parking facilities have been submitted to and approved in writing by the LPA. Thereafter, the proposed cycle parking shall be provided before occupation and maintained and retained at all times for the use of the development.

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

Policy 3.16B of the London Plan 2011 and policy CI1 of the Local Plan Part 1 2012 seeks to resist the loss of social infrastructure in areas of defined need for that type of social infrastructure. Community and social infrastructure includes uses such as Police Stations, which serve local residents. Policy 3.16B of the London Plan adds that the suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed, before alternative developments are considered.

Saved Policy R11 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the local planning authority will assess proposals which involve the loss of land or buildings used or whose last authorised use was for education, social, community and health services by taking into account whether:-

- (i) there is a reasonable possibility that refusal of permission for an alternative use would lead to the retention and continued use of the existing facility;
- (ii) adequate accessible alternative provision is available to meet the foreseeable needs of the existing and potential users of the facility to be displaced;
- (iii) the proposed alternative use accords with the other policies of this plan and contributes to its objectives.

In this case, the Mayor's Office for Policing and Crime has disposed of the site on the basis that it is surplus to its requirements and replacement facilities are being provided in the vicinity, which adequately and demonstrably meet the policing needs of the local population.

The loss of the West Drayton Police Station is part of a more radical strategy by the Mayor's Office for Policing and Crime. Furthermore, it is noted that the police station was purpose built for this use and therefore does not lend itself well to conversion to an alternative community use.

In addition, the site has been marketed since 2013, but no community based based

operators have expressed an interest in acquiring the site for these purposes. It is worth noting here that this is a relatively large site, which would make it unviable for typical local community uses such as meeting halls.

Saved Policy H8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states amongst other things, that the conversion or change of use of premises to residential use will only be acceptable if a satisfactory residential environment can be achieved. As detailed in other sections of this report, the proposed use could provide an adequate residential environment, notwithstanding the specific site constraints.

In light of the above considerations, it is concluded that the proposed change of use of the land meets the policy requirements of the adopted Development Plan. No objections are therefore raised to the principle of residential use on the site.

## **7.02 Density of the proposed development**

Policy 3.4 of the London Plan has regard to density. It seeks to optimise housing potential on sites taking into account local constraints. The site is in a suburban setting with a Public Transport Accessibility Level (PTAL) of 2 (on a scale of 1 to 6). These guidelines take into account public transport accessibility, the character of the area and type of housing proposed.

Table 3.2 of the London Plan recommends that for a PTAL of 2, a density of 150-250 hr/ha or between 50-95 u/ha, (assuming 2.7-3.0 hr/u) can be achieved for the application site.

The proposal seeks to provide 43 residential units totalling 112 habitable rooms. This equates to a density of 173 hr/ha or 66 u/ha. This level of development is within the guidelines set out within Table 3.2 density matrix of the London Plan, assuming a PTAL of 2. In light of this, the 43 dwellings proposed on a site area of 0.646 ha is considered appropriate.

Nevertheless it will be important to demonstrate that the units will have good internal and external living space, and that the scale and layout of the proposed development is compatible with sustainable residential quality, having regard to the specific constraints of this site, including its conservation area designation and proximity to a grade 2 listed building. As set out in relevant sections of this report, it is considered that this residential scheme has been designed at to meet the relevant policy standards and targets, by making effective and efficient use of redundant brownfield land whilst respecting the surrounding context.

### **UNIT MIX**

Saved Policies H4 and H5 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to ensure a practicable mix of housing units are provided within residential schemes. One and two bedroom developments are encouraged within town centres, while larger family units are promoted elsewhere. A mixture of 9 x 1 bedroom, 22 x 2 bedroom flats, together with 11 x 3 bedroom and 1 x 4 bedroom houses is proposed and this mix of units is considered appropriate for this location.

## **7.03 Impact on archaeology/CAs/LBs or Areas of Special Character**

The site is within the West Drayton Green Conservation Area towards its eastern periphery. Part of the walls in the rear car park which relate to the adjoining Drayton Hall are listed. Drayton Hall, a grade II listed building, which was first listed in 1950 lies to the north. Drayton Hall is the principal building of architectural merit within the Conservation Area and the grounds of the Hall form a significant component in the Conservation Area.

Also to the north is West Drayton Cemetery.

## ARCHAEOLOGY

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation.

Policy BE1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the Local Planning Authority will only allow development, which would disturb remains of importance in archaeological priority areas where exceptional circumstances can be demonstrated. Part 2 Saved Policy BE3 states that the applicant will be expected to have properly assessed and planned for the archaeological implications of their proposal. Proposals which destroy important remains will not be permitted.

The site lies within the Colne Valley Archaeological Priority Area on the edge of West Drayton Green Conservation Area and its burial ground in the former grounds of Drayton Hall. The Greater London Archaeological Advisory Service (GLAAS) initially commented that the application is only supported by a cursory Heritage Statement, which is not compliant with the NPPF, as it does not reference the Historic Environment Record, nor does it assess the site's archaeological interest. Nor has it used the full range of sources which would be expected of an archaeological desk based assessment.

GLAAS therefore recommended that further studies should be undertaken to inform the preparation of proposals and accompany the planning application. The ensuing archaeological report would need to establish the significance of the site and the impact of the proposed development. If archaeological safeguards prove necessary, these could involve design measures to preserve remains in situ, or where that is not feasible, archaeological investigation prior to development.

Following comments from GLAAS, the applicants commissioned an archaeological evaluation excavation at the site, in accordance with a Written Scheme of Investigation (WSI), in compliance with a brief issued by the Archaeology Team at GLAAS. The purpose of the evaluation excavation was to determine whether any archaeological remains are present within the site, perhaps of a prehistoric date or relating to the adjacent cemetery or walled garden of Drayton Hall, and to determine their extent and condition. A report of the findings was referred to GLAAS for comment.

The findings concluded that the fieldwork revealed poor below ground survival of the 19th and 20th century outbuildings in the former walled garden of Drayton Hall, as the walls were demolished down to their foundations for the construction of the police station car park in the 1960s. Construction of the police station also appears to have truncated the natural deposit at the rear, west end of the site. Quarry activity was recorded within the front lawn of the site and at the east end of the walled car park. Clay was extracted for an adjacent brickfield, which map evidence suggests was out of use by 1828. The brick field extended into the north end of the site, within the footprint of the present driveway. Infilling of the clay pits took place between the late 19th and early 20th centuries, with that to the west being infilled earlier for the construction of the walled garden. There was no evidence that the Post Medieval cemetery beside Drayton Hall extended south into the northern extent of the site.

The report recommended that no further archaeological works be undertaken at the site as



the building remains are poorly preserved and recorded on historic mapping; a large part of site has been quarried away or truncated, and there is no evidence of the Post Medieval cemetery. English Heritage (GLAAS) has advised that no further assessment or archaeological conditions are necessary.

## LISTED BUILDINGS

Policy BE10 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that development proposals should not be detrimental to the setting of a listed building. This includes views to listed buildings (i.e. Drayton Hall). Any development would therefore be expected to address these matters.

The site directly abuts the grounds of Drayton Hall, a Statutory Grade 2 listed building,

### Listed Walls:

The existing car park area in the north-west zone of the site formed part of the kitchen garden to the original Drayton Hall grounds. The walls defining this area are original, with the exception of the eastern boundary which is modern and presumably related to the construction of the police station. The condition of the original walls is mixed with some parts retaining their original character, some parts rendered to disguise their poor condition and some parts completely replaced.

The walls on the boundary will remain as garden walls to the new houses. However, the western wall now falls in the middle of the proposed housing development and requires sensitive treatment. It is proposed to retain the wall and integrate it with house units 38-41 inclusive.

One of the existing bricked up openings will be re-opened to form the entrance to number 38. However, new openings are proposed in the wall to allow access to the front doors to numbers 39 & 40. The listed wall currently has two different sections of kerb at its base to provide protection from cars. The western section of this protection will be replaced by a public planted area. However the eastern section of kerbing will be retained to protect the wall from the new parking layout.

The Urban Design and Conservation Officer considers that this is an acceptable solution, allowing the wall to form a significant and unique element in the new mews area of the development.

### Setting of Drayton Hall:

With regard to the impact of the development on the setting of Drayton Hall itself, which is located approximately 70/85 metres from the site boundaries, it is screened from the site by an original high brick wall and a significant number intervening trees.

The development has been limited to four storeys so as not to appear overly dominant within the setting of the heritage assets. The flatted accommodation which at 4 storeys is the highest element of the development has also been carefully positioned towards the front of the site, to allow a greater separation distance between the proposed development and Drayton Hall. This also means that the most dense element of the development is read in the context of the more urban aspects of the surrounding area on Harmonsworth Road, Station Road and Sipson Road.

It is therefore considered that the proposal would not have a detrimental impact on the

setting of the listed building, in accordance with Saved Policy BE10 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

## CONSERVATION AREA

Policy BE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that new development within or on the fringes of conservation areas will be expected to preserve or enhance the features, which contribute to the Conservation Area's special architectural or visual qualities.

The site is located within the West Drayton Green Conservation Area. The West Drayton Green Conservation Area's most notable features are the pockets of open space, the collection of listed buildings around Church Road and most notably, Drayton Hall to the north of the application site. Other buildings within the conservation area are mainly comprised of typical 1930's residential development.

### Demolition of Existing Structures:

The former police station was built in 1965 and is constructed mostly in a light brown brick with pre-cast concrete panels on the east elevation and white metal windows. The entrance is located on the north elevation which in addition to the brick is defined by wooden doors and an adjoining slate panel. The most attractive feature of the building is the copper roof and its landscaped setting. The rear of the site contains functional outbuildings, some original in the matching brick, with some pre-fabricated buildings of poor quality. The rear is also dominated by the extent of car parking and its associated concrete hard-standing.

The main building is typical of its period and the architectural quality is not considered to justify its retention. As such, it is not considered to contribute positively to the character of the Conservation Area and its loss would be acceptable. Similarly, the functional outbuildings, which are almost derelict, do not contribute to character of the conservation area. No objections are therefore raised to the demolition of the existing buildings on the site.

The only redeeming feature of the rear is the listed wall that originally related to Drayton Hall. This is to be largely retained and integrated within the proposed development.

### Impact on the Conservation Area:

By maintaining a tree lined frontage and grassed area in front of the flatted accommodation views within the Conservation Area will be maintained. The front of the site would retain a fairly pleasant quality, mostly due to its setting.

The applicant has submitted a study for the possible impact of the PV roof panels on external views of the site, particularly from views from Station Road, the parkland to the west of the site and Drayton Hall. It is noted that the pitch of the roof is very low, the site is well shielded with trees, a significant number being conifers, along and adjoining its perimeter and the view from Drayton Hall is a relatively long at approximately 90 metres.

Overall, it is considered that the scheme will introduce a built form that is appropriate to its Conservation Area context and will improve the townscape character of the area, by removing redundant and degraded commercial buildings. The proposals will conserve and

enhance the setting for the listed wall and also enhance the quality of the conservation area, in compliance with Policy BE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

#### **7.04 Airport safeguarding**

There are no airport safeguarding issues related to this development.

#### **7.05 Impact on the green belt**

There are no Green Belt issues associated with this site.

#### **7.07 Impact on the character & appearance of the area**

Part 1 policy BE1 of the Local Plan requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. Saved Part 2 Policies BE13 and BE19 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to ensure that new development complements or improves the character and amenity of the area, whilst Policy BE38 seeks the retention of topographical and landscape features and provision of new planting and landscaping in development proposals.

London Plan Policy 7.1 sets out a series of overarching design principles for development in London and policy 7.6 seeks to promote world-class, high quality design and design-led change in key locations. In addition to Chapter 7, London Plan policies relating to density (3.4) and sustainable design and construction (5.3) are also relevant.

The scale, bulk and siting of buildings are key determinants in ensuring that the amenity and character of established residential areas are not compromised by new development. The main constraints and opportunities of the site have been identified, in particular its relationship to Drayton Hall and its location within West Drayton Green Conservation Area.

#### **Layout**

The flats have been located at the front of the site with the houses at the rear. The rear of the site is more appropriate for the scale and privacy requirements of houses, whilst the flats will utilise the open setting at the front of the site. The building line of the new flats building would line through with the adjoining Community Centre.

The existing access road is maintained and leads into the site to form a natural divide between the flats and the houses.

#### **Scale**

The proposed development site is somewhat visually disconnected from the surrounding street scape by virtue of its location in the open area, its set back from Station Road, and the existing boundary tree screen on the site's street frontage.

The proposed scale of the flats building is 4 storeys, with the top floor designed as a subordinate structure with set backs. The height of the flats building matches the height of the Drayton Hall extension. The houses are 3 storeys high with the top floors again designed as subordinate structures within the proposed roof form.

#### **Appearance**

The principal characteristics of the design of the houses are:

- A layered approach with a brick base ground floor level, a white rendered first floor and

lead coloured profiled cladding to the second floor mansard;

- The first floor street elevations have an inset panel that would contain contrasting materials and or colour.
- The listed wall has been integrated into the design of house units 38-42 inclusive.

The principal characteristics of the flats design are:

- A layered approach with a brick ground floor level, a combination of white rendered and brick clad first and second levels and lead coloured profiled sheeting to the mansard.
- The street elevations at first and second floor levels are highly glazed, which is considered appropriate given the open setting and provision of balconies.
- The existing copper roofs are referenced in the new proposals with copper cladding to the cycle lift in the forecourt area.

Nevertheless it will be important to ensure that appropriate materials landscaping are secured by condition. Subject to compliance with the above mentioned condition, it is considered that the scheme is compliant with Policies BE13, BE19 and BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), relevant London Plan policies and design guidance.

## **7.08 Impact on neighbours**

### Outlook and Light

Policy BE20 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the Local Planning Authority will seek to ensure that buildings are laid out so that adequate daylight, sunlight and amenities of existing houses are safeguarded. Policy BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that planning permission will not be granted for new development, which by reason of its siting, bulk and proximity, would result in a significant loss of residential amenity of established residential areas.

The closest residential properties to the site is the caretakers flat at the adjoining Community Centre to the south of the site. There are no other residential properties in close proximity to the site. The proposal complies with relevant guidance and is not considered to result in an over dominant form of development which would detract from the amenities of neighbouring occupiers, in compliance with Policy BE21 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

Similarly, is not considered that there would be a material loss of daylight or sunlight to the neighbouring property, as the proposed buildings would be sited a sufficient distance away from the caretaker's flat. Given its orientation and relationship with neighbouring residential windows, the proposals would not create a material loss of daylight or sunlight to neighbouring properties, in accordance with Policy BE20 of the Local Plan Part 2 and relevant design guidance.

### Privacy

Policy BE24 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the design of new buildings should protect the privacy of occupiers and their neighbours. (HDAS) Supplementary Planning Document: Residential Layouts, also sets out a minimum distance of 21m between facing habitable room windows, as measured at a 45 degree line from the centre of the nearest first floor window.

Detailed measures have been incorporated into the design of the houses backing onto the

Community Centre boundary. These include oriel windows to the first floor bedroom windows on the rear elevations and obscure glazing to the second floor rear bathroom windows. The rear windows of the flats fall outside the 45 degree angle of vision. It is therefore considered that there would be no loss of privacy to adjoining occupiers of the care takers flat. The development is therefore in accordance with Policy BE24 of the Local Plan Part 2 and relevant design guidance.

## **7.09 Living conditions for future occupiers**

### External Amenity Areas

Policy BE23 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) requires the provision of external amenity space, sufficient to protect the amenity of the occupants of the proposed and surrounding buildings and which is usable in terms of its shape and siting. The Council's SPD Residential Layouts specifies amenity space standards for flats. Hillingdon Design and Accessibility Statement (HDAS) Supplementary Planning Document - Residential layouts, suggests that the following shared amenity space for flats and maisonettes is provided:

- 1 bedroom flat - 20m<sup>2</sup> per flat
- 2 bedroom flat - 25m<sup>2</sup> per flat
- 3 bed houses -60m<sup>2</sup> per house
- 4 bed houses- 100m<sup>2</sup> per house

Each of the houses achieve and in most cases exceed the private amenity space standards. Based on the current accommodation schedule for the flats, the communal amenity space requirements would equate to a total of 730 m<sup>2</sup>. The current development proposal provides 796 m<sup>2</sup> of useable communal amenity space, including 60 m<sup>2</sup> of play space provision, which would have good natural surveillance from the proposed apartments.

The majority of the 2 bedroom flats also benefit from private space in the form of balconies, which make up an additional area of 80 m<sup>2</sup>. This would provide an overall total of 892 m<sup>2</sup> of amenity space which would exceed the relevant standards contained in the HDAS. The amenity space provided is considered acceptable, in compliance with the Hillingdon Design and Accessibility Statement (HDAS) Residential Layouts and Saved Policy BE23 of the Local plan.

### Unit size

Planning policy requires that all new housing should be built to Lifetime Homes standards, with 10% of new housing designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Policy 3.5 of the London Plan endorses a range of minimum unit sizes for new residential development in London.

All the individual flats and houses meet London Plan minimum floorspace standards set out at Table 3.3 and those set out within the London Housing Design Guide, providing a good standard of accommodation to future residents. In addition, the submitted plans and documentation, including the planning statement and Design and Access Statement illustrate that lifetime homes and wheel chair standards could be achieved, in accordance with London Plan Policy 3.8 and the Council's Supplementary Planning Document "Accessible Hillingdon" adopted January 2010.

### Outlook and Light

The units have been designed wherever possible to be dual aspect. All of the 2 bedroom flats have balconies as well as access to the communal amenity area within the scheme. Each of the houses also have private gardens, which would receive adequate amounts of sunlight. It is therefore considered that all of the proposed units would benefit from reasonable levels of outlook and light, in compliance with Policies BE20 and BE21 of the Hillingdon Local Plan: Part 2 -Saved UDP Policies (November 2012), HDAS: Residential Layouts and the provisions of the London Plan.

#### Privacy

Saved Policy BE24 states that the design of new buildings should protect the privacy of occupiers and their neighbours. A minimum separation distance of 21 metres is required to avoid overlooking and loss of privacy. It is considered that the design of the development would protect the privacy of future occupiers, in accordance with Policy BE24 of the Hillingdon Local Plan: Part 2 -Saved UDP Policies (November 2012) and relevant design guidance.

#### **7.10 Traffic impact, Car/cycle parking, pedestrian safety**

The National Planning Policy Framework (NPPF) at Paragraph 32 states that plans and decisions should take account of whether safe and suitable access to the site can be achieved for all people; and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Paragraph 35 of NPPF also refers to developments and states that developments should be located and designed where practical to give priority to pedestrian and cycle movements; create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.

Local requirements in relation to impacts on traffic demand, safety and congestion are set out in Local Plan Part 2 policy AM7 which states: The LPA will not grant permission for developments whose traffic generation is likely to:

- (i) unacceptably increase demand along roads or through junctions which are already used to capacity, especially where such roads or junctions form part of the strategic London road network, or
- (ii) prejudice the free flow of traffic or conditions of general highway or pedestrian safety

#### Access

Access to the site would be via Station Road utilising the existing access arrangement. A single access road would run through the site providing access to the flats as well as the houses located to the rear. The proposed site access road is 4.8 metres wide, with a 1.8 metre wide pavement on one side together and a 1 metre service strip on the other side. The road is tarmaced up the entrance of the mews area of the houses to the rear. The mews area is a shared surface, with definition in the paving design of the vehicular movement areas.

"Keep Clear" road marking will be provided at the access to the site, across the width of the adjacent carriageway, in order to prevent vehicles queuing across the access to the site.

The existing access will be widened to provide a 10m radius on the left side and a 12m radius on the right side to allow a refuse vehicle and car to turn into and out of the access. The access road has been widened to 5.5m to allow for a car and refuse vehicle to pass

one another.

#### Traffic Generation

The applicant has submitted a Transport Assessment to consider the traffic impacts on the existing road capacity.

The proposed development would generate 9.42 additional trips in the am peak hour and 6.48 additional trips in the pm peak hour. Over the day, the proposed development would only lead to a total of 68 trips additional trips. Given the small increase in additional trips in the peak hours and in total throughout the day, it is considered that these can be easily accommodated on the local road network. These small additional trips are unlikely to materially worsen the current situation on the local highway network or the wider highway network. Considering Paragraph 32 of the National Planning Policy Framework (NPPF), these increases are minimal and could not be considered in any way 'severe'. Therefore, there are no unacceptable highway or transport impacts as a result of the proposed development.

#### Parking

The London Plan Policy 6.1 states that 'the need for car use should be reduced, with Table 6.2 stating that there should be a maximum of 1 space for 1-2 bed units. The application proposes a total of 49 parking spaces, including 10% of these spaces for people with a disability. This equates to 1.14 spaces per unit.

The 12 houses would be served by 19 car parking spaces (6 curtilage and 13 communal). The 31 flats would be served by 30 car parking spaces, including 27 spaces within a lower ground floor car park. The Council's standards allow for a maximum provision of 1.5 spaces per communal parking per residential unit, or 2 spaces for curtilage parking a total of 66 spaces in this case.

The site has a PTAL rating of 2 and it is considered that residents of the proposed development would have relatively good access to all day to day facilities and to the wider London area, via reasonable public transport connections. The proposed 1.14 parking spaces per dwelling therefore meets the NPPF policy guidance by being in line with expected existing and future need, taking into account the type, mix and use of the development. In addition, the provision of electric charging points can be secured by condition.

Overall, it is considered that the proposals strike the requisite balance between parking restraint, to promote alternative travel modes and the provision of adequate parking. The proposed level of parking meets LBH's UDP standards as well as all London Plan standards.

As such, the Council's Highways Engineer has raised no objection to the level of car parking. The proposal is therefore considered to comply with Local Plan Part 2 Saved Policies AM14 and AM15 and relevant London Plan policies.

#### Cycle Storage

The submitted plans indicate that secure cycle storage can be provided for 27 cycle spaces in this lower ground floor car park and 9 at ground floor level. The scheme would

therefore be in accordance with the Council's standards and Local Plan Part 2 Saved Policies AM9.

#### **7.11 Urban design, access and security**

##### **SECURITY**

The flats overlook the main amenity area providing good visual contact with the site. Details of fencing and other security arrangements, including the boundary treatment and CCTV have been secured by condition.

#### **7.12 Disabled access**

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from direct discrimination on the basis of a protected characteristic, which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers likely have a defined model that meets best practice design guidance. The submitted documentation has explained how the principles of access and inclusion have been applied to this scheme.

The Access Officer has made a number of observations in relation to the original submission. These were addressed by the provision of additional details.

Four wheelchair units have been provided within the scheme. These comprise flat units 5, 12, 20 & 28. The car parking for these flats is contained within the lower ground floor car park, providing a sheltered and secure environment with direct access to the lift. A covered car park space is provided for unit 43. A ramp is provided from the main pedestrian access route in front of the flats to a sitting area in the grounds.

Eight of the houses have low approach gradients. However, four houses, nos. 42, 43, 32 & 34, require gently slopping ramps with gradients just below 1:20.

The topography at the eastern end of the mews area contains the basement of the existing building and the access road drops at this point as it slopes down towards the basement car park. This creates the need for the gently slopping ramp approaches.

Subject to conditions, it is considered that lifetime homes and wheel chair standards can be achieved, in accordance with the London Plan Policies 3.8, 7.1 and 7.2 and in general compliance with the Council's Supplementary Planning Document "Accessible Hillingdon".

#### **7.13 Provision of affordable & special needs housing**

The development would introduce a total of 43 dwellings, therefore triggering the affordable housing requirement threshold of 10 units as set out in London Plan policy 3.13. A full GLA Toolkit Appraisal has been carried out in support of this application Policy H2 of the Hillingdon Local Plan: Part 1- Strategic Policies relates to Affordable Housing with the Council seeking 35% of all new units in the borough delivered as affordable housing. The Council note however, subject to the provision of robust evidence, it will adopt a degree of flexibility in its application of Policy H2 to take account of tenure needs in different parts of the borough as well as the viability of schemes.

On this basis, 15 of the 43 units proposed in the scheme would have to be provided as affordable housing to comply with the requirements of Policy H2. This is to be secured by way of the S106 Agreement, with a review mechanism.

#### **7.14 Trees, landscaping and Ecology**



## TREES AND LANDSCAPING

Local Plan Part 2 Policy BE38 stresses the need to retain and enhance landscape features and provide for appropriate (hard and soft) landscaping in new developments. An arboricultural survey has been carried out making an assessment of existing trees on and within the vicinity of the site.

The tree screen to the road, the trees to the boundary side of the drive, and the tree group to the community centre boundary will all be retained. The trees to the south side of the drive and the smaller trees dotted around the grassed area will largely be removed to facilitate the new development.

It is proposed to use some of the cut from the construction of the new lower ground floor car park to significantly level the existing slope of the grassed forecourt area. This would make the area more usable for amenity reasons.

A silver birch tree close to the car park edge will be retained with an informal sunken seating area formed around it. Two additional silver birches will be planted to form a small cluster. Shrub planting will be added to edge sections of the amenity area to soften the landscape and add interest for the flats overlooking the overall area.

The tree screen to the western boundary will be retained with the exception of the ash (T3) as its root protection area will be compromised by the new development. Given the extent of other trees on the other side of the boundary this loss to the visual amenity should not be significant.

The tree survey identified significant trees on the adjoining sites on the northern and southern boundaries, however these trees would not be affected by the development as they will adjoin the gardens of the new houses.

At present there is no soft landscaping or any form of planting to the rear of the site. The small loss of trees to facilitate the development will be mitigated by the replacement of significant areas of hard surfacing by garden areas and public planting beds and the inclusion of a significant number of 'urban' trees around the new mews area. An additional, sense of space would be created by adoption of an open front garden policy with the boundaries defined by planting rather than fences.

It is proposed that the access road will be tarmaced with a traditional paved footpath from the site entrance to the entrance of the mews area at the rear. The mews area would be shared surface with permeable block paving. The paving design would allow for definition of the vehicular use area.

At present the site is enclosed by a variety of boundary wall constructions: low brick wall to the street front, cast iron railings to the former graveyard and listed wall to the rear northern boundary and part western boundary. These will remain as existing, subject to any necessary maintenance. The security fence to the residual western boundary and part southern boundary will be retained with the barbed wire top removed and disguised with suitable climbing plants. The southern boundary is defined by existing outbuildings and poor quality timber fencing. These will be replaced by to the front southern boundary new timber fences.

The Trees and Landscape Officer raises no objections subject to conditions to ensure that

the detailed landscape proposals preserve and enhance the character and appearance of the area and off It is considered that the scheme is on the whole acceptable and in compliance with Saved Policy BE38 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

## ECOLOGY

Local Plan Part 1 Policy EM7 and Saved Policy EC2 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek the promotion of nature conservation interests. Saved Policy EC5 seeks the retention of features, enhancements and creation of new habitats. London Plan Policy 7.19[c] seeks ecological enhancement.

Although the trees in the site may be valuable for biodiversity, the application site itself is not considered to have a high ecological value, due to the lack of potential for protected species.

A Phase 1 Habitat Survey, protected species assessment and bat survey of the site have been carried out. The Council's Sustainability Officer notes that the proposed development results in the loss of several trees and although the site is unlikely to have significant value for wildlife, the National Planning Policy Framework requires a net gain in biodiversity value. A condition requiring details of an ecological enhancement scheme, to promote and enhance wildlife opportunities within the landscaping and the fabric of the buildings is therefore recommended. The scheme could include, living screens against walls of the development, bat and bird boxes, habitat walls and a range of plants to encourage and support wildlife, together with an area of land dedicated to wildlife habitat.

Subject to compliance with this condition, it is considered that the ecological mitigation is satisfactory. The proposal therefore complies with Policy 7.19 of the London Plan which requires that development protects and enhances biodiversity, and Local Plan Part 1 Policy EM7 and relevant Local Plan Part 2 policies.

### **7.15 Sustainable waste management**

There is a bin store within the ground floor of the building containing ten 1100 litre wheelie-bins with easy access from the road. Waste storage for the houses is provided within their curtilage.

### **7.16 Renewable energy / Sustainability**

Sustainability policy is now set out in the London Plan (2011), at Policy 5.2. Part A of the policy requires development proposals to make the fullest contribution to minimising carbon dioxide emissions by employing the hierarchy of: using less energy; supplying energy efficiently; and using renewable technologies. Part B of the policy currently requires non domestic buildings to achieve a 40% improvement on building regulations. Parts C & D of the policy require proposals to include a detailed energy assessment.

The scheme seeks to achieve Code 4 in accordance with the Mayor's energy requirements, whilst the development suitably demonstrates a 40% reduction in CO<sub>2</sub>, largely through the use of PV panels. The roof plans show 400 sq.m of PV panels and these are these incorporated into the design. The Council's Sustainability Officer therefore raises no objections, subject to the development being completed in accordance with the submitted energy report. This can be conditioned in the event of an approval.

Subject to a condition securing the on site renewable energy and that the development achieves Level 4 of the Code for Sustainable Homes, it is considered that the scheme will have satisfactorily addressed the issues relating to the mitigation and adaptation to climate

change and to minimising carbon dioxide emissions, in compliance with Policies 5.2, 5.13 and 5.15 of the London Plan, Policy PT1.EM1 of Hillingdon Local Plan Part 1 and the NPPF

#### **7.17 Flooding or Drainage Issues**

Policies OE7 and OE8 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to ensure that new development incorporates appropriate measures to mitigate against any potential risk of flooding. The site falls outside any flood zones as defined in the Council's own Strategic Flood Risk Assessment (SFRA) and is within flood zone 1 on the Environment Agency maps. A flood risk assessment is therefore not a requirement, although a Drainage Strategy would need to demonstrate that it would incorporate sustainable drainage techniques and reduce the risk of flooding in accordance with the requirements of Policies 5.11, 5.12 and 5.13 of the London Plan and the NPPF.

The drainage strategy would have to demonstrate the surface water run-off generated to and including the 1 in 100 year critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme would also need to include provision of on-site surface water storage to accommodate the critical duration 1in 100 year storm event, with an allowance for climate change. This could be secured by condition in the event of an approval.

Subject to compliance with this condition, it is considered that the scheme will have satisfactorily addressed drainage and flood related issues, in compliance with the Hillingdon Local Plan: Part 2 Policies OE7 and OE8, Policies 5.13 and 5.15 of the London Plan and the aspirations of the NPPF.

#### **7.18 Noise or Air Quality Issues**

##### **NOISE**

The Government's National Planning Policy Framework (NPPF) which replaces PPG24 (Planning and Noise) gives the Government's guidance on noise issues. Policy 7.15 of the London Plan seeks to reduce noise and minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals. A noise assessment has been carried out in support of the application and concludes that the principle of residential accommodation is acceptable in this location, subject to mitigation measures outlined within the report.

A baseline noise survey was undertaken to establish prevailing noise levels across the development site.

The application site is on a busy high road. It is therefore reasonable to expect that traffic is likely to be high enough to affect the residential amenities of future occupiers. Based on the results of the noise survey, guidance on maximum allowable noise emissions for any proposed plant serving the development has been proposed to ensure the local authority's emissions criteria can be met at nearby noise sensitive receptors. It is concluded that the site is suitable for residential development subject to a suitable scheme of mitigation measures being incorporated into the design. Further detail on noise control measures will be provided during detailed design.

It is considered that flatted development is acceptable in principle, subject to adequate sound insulation. The acoustic assessment contains recommendations, which, if implemented, would reduce noise to levels that comply with reasonable standards of comfort, as defined in British Standard BS 8233:1999 'Sound insulation and noise reduction for buildings - Code of Practice'. It is considered that the issue of sound insulation can be addressed by the imposition of suitable conditions, as suggested by the

Council's Environmental Protection Unit. Subject to compliance with these conditions, it is considered that the scheme would be in compliance with Policy OE5 of the Hillingdon Local Plan part 2.

## AIR QUALITY

The proposed development is within the declared AQMA. The development is introducing sensitive receptors into a poor air quality area. The Council's Environmental Protection Unit has therefore requested conditions to provide details of the final energy provision at the site and a Section 106 obligation up to £12,500 for contributions to the air quality monitoring network in the area.

Subject to the above mentioned condition and planning obligation, it is considered that the impact of the development on the air quality of the area can be mitigated, to the extent that refusal of the application on these grounds would not be justified, in accordance with Policy EM8 of the Local Plan Part 1.

### **7.19 Comments on Public Consultations**

The main issues raised have been dealt with in the main body of the report.

### **7.20 Planning obligations**

Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) is concerned with securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. These saved UDP policies are supported by more specific supplementary planning guidance.

The Council's Section 106 Officer has reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impacts of the development, which have been agreed with the applicant:

- (i) Transport: All on site and off site highways works as a result of this proposal, including improvements to the site access.
- (ii) Affordable Housing including a a review mechanism
- (iii) Construction Training: either a construction training scheme delivered during the construction phase of the development or a financial contribution of £35,000
- (iv) Air Quality: The applicant provides a financial contribution in the sum of £12,500.
- (v) Project Management and Monitoring Fee: a contribution equal to 5% of the total cash contribution to enable the management and monitoring of the resulting agreement.

The applicant has agreed to these proposed Heads of Terms, which are to be secured by way of the S106 Agreement. Overall, it is considered that the level of planning benefits sought is adequate and commensurate with the scale and nature of the proposed development, in compliance with Policy R17 of the Hillingdon Local Plan: Part 2 - SavedUDP Policies (November 2012).

### **7.21 Expediency of enforcement action**

There are no enforcement issues associated with this site.

### **7.22 Other Issues**

None.

## **8. Observations of the Borough Solicitor**

## General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

## Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

## Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

## Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

## **9. Observations of the Director of Finance**

Not applicable.

## **10. CONCLUSION**

No objection is raised to the principle of the residential use of this site. The density of the proposed development falls within London Plan guidance.

It is considered that the discussions and negotiations between relevant parties on the design and layout of the development and the extent of amendments undertaken have yielded a scheme suitable for its context. The scheme will introduce a built form that is appropriate to its Conservation Area context and the townscape character of the area, by removing redundant and degraded commercial buildings.

The archaeological position of the site has been extensively explored and has been satisfactorily addressed. It is not considered that the scheme would be detrimental to the setting of the nearby listed Drayton Hall.

Furthermore, the development would not result in unacceptable impacts on the amenities of neighbouring properties and would provide good environmental conditions for future occupiers.

The applicant has offered an acceptable package of contributions to be secured by way of a proposed S106 Agreement. In addition, access, parking and highway safety issues have been satisfactorily addressed.

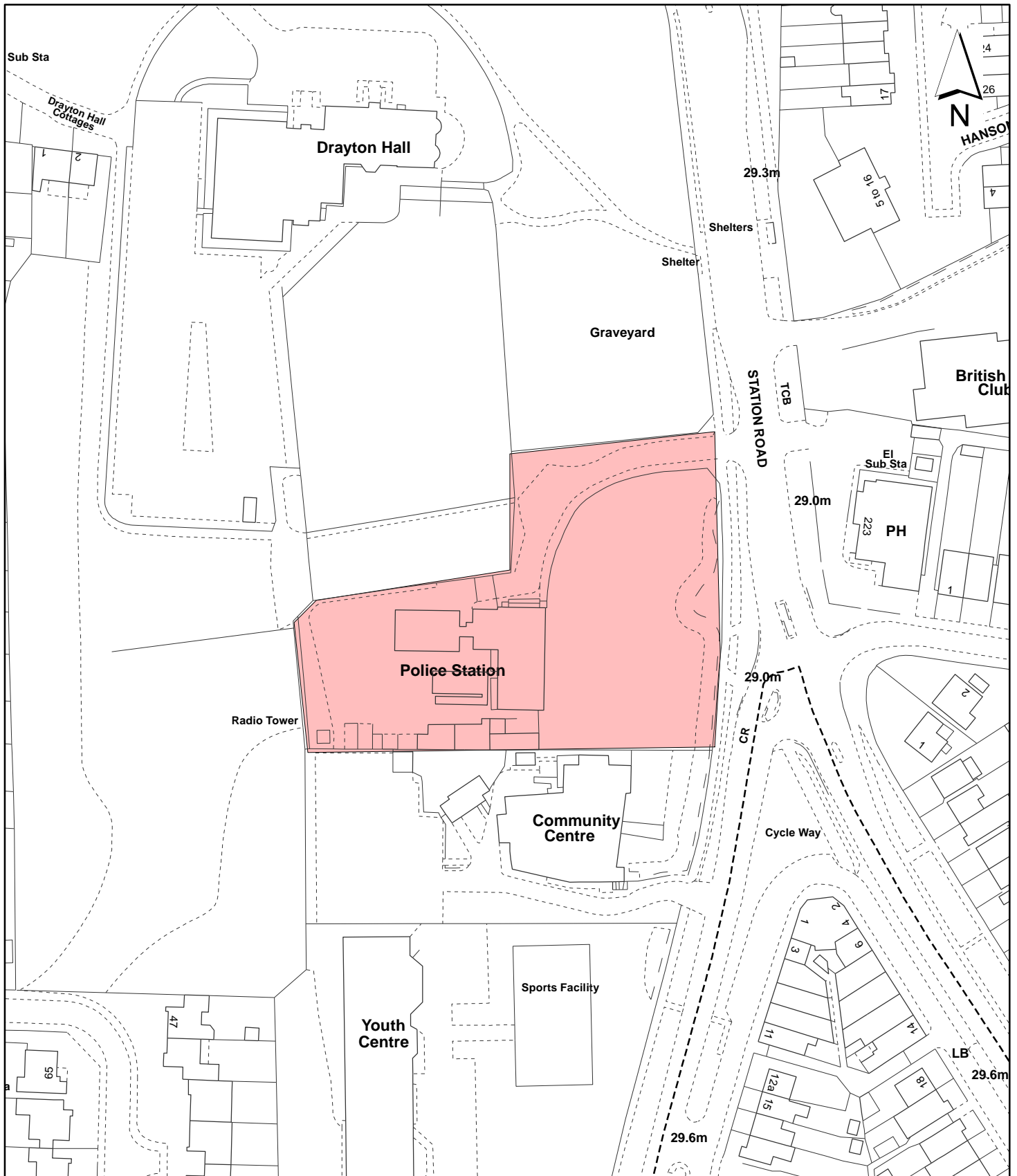
It is recommended that the application should be supported, subject to a Section 106 Legal Agreement and conditions.

## **11. Reference Documents**


The Hillingdon Local Plan: Part 1- Strategic Policies (8th November 2012)  
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)  
London Plan 2011  
National Planning Policy Framework (NPPF)  
The Greater London Authority Sustainable Design and Construction (2006)  
Council's Supplementary Planning Guidance - Community Safety by Design  
Council's Supplementary Planning Document - Air Quality  
Hillingdon Supplementary Planning Document: Accessible Hillingdon (January 2010)

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**Notes**

 Site boundary

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Site Address

**Former West Drayton Police Station  
 Station Road  
 West Drayton**

Planning Application Ref:  
**12768/APP/2014/1870**

Planning Committee  
**Major**

Scale  
**1:1,250**

Date  
**March 2015**

**LONDON BOROUGH  
 OF HILLINGDON**  
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