

Report of the Head of Planning, Transportation and Regeneration

- Address** CHAILEY INDUSTRIAL ESTATE PUMP LANE HAYES
- Development:** Redevelopment of the site to provide three buildings ranging from 2 to 11 storeys in height delivering 333 residential units and 710 sq.m of ground floor commercial floorspace (Use Classes A1, A2, A3, B1, D1 or D2), including the provision of private and communal amenity areas, child play space, car parking, secure cycle parking, refuse storage areas and other associated development.
- LBH Ref Nos:** 2102/APP/2018/4231
- Drawing Nos:**
- TC70P02 Rev 1A - Proposed Second Floor Plan Block C
 - TC70P01 Rev 1A - Proposed First Floor Plan Block C
 - TC70P00 Rev 1A - Proposed Ground Floor Plan Block C
 - TC70P05 Rev 1A - Proposed Fifth Floor Plan Block C
 - TC70P04 Rev 1A - Proposed Fourth Floor Plan Block C
 - TC70P03 Rev 1A - Proposed Third Floor Plan Block C
 - TD70P04 Rev 1A - Proposed Fourth Floor Plan Block D.
 - TD70P05 Rev 1A - Proposed Fifth Floor Plan Block D
 - TD70P06 Rev 1A - Proposed Sixth Floor Plan Block D
 - TD70P00 Rev 1A - Proposed Ground Floor Plan Block D
 - TD70P03 Rev 1A - Proposed Third Floor Plan Block D
 - TD70P02 Rev 1A - Proposed Second Floor Plan Block D
 - TD70P01 Rev 1A - Proposed First Floor Plan Block D
 - TE70P02 Rev 1A - Proposed Second Floor Plan Block E.
 - TE70P03 Rev 1A - Proposed Third Floor Plan Block E
 - TE70P04 Rev 1A - Proposed Fourth Floor Plan Block E
 - TE70P00 Rev 1A - Proposed Ground Floor Plan Block E
 - TE70P01 Rev 1A - Proposed First Floor Plan Block E
 - TE70P05 Rev 1A - Proposed Fifth Floor Plan Block E
 - TE70P06 Rev 1A - Proposed Sixth Floor Plan Block E
 - TF70P04 Rev 1A - Proposed Fourth Floor Plan Block F
 - TF70P02 Rev 1A - Proposed Second Floor Plan Block F.
 - TF70P03 Rev 1A - Proposed Third Floor Plan Block F
 - TF70P05 Rev 1A - Proposed Fifth Floor Plan Block F
 - TF70P06 Rev 1A - Proposed Sixth Floor Plan Block F.
 - TF70P07 Rev 1A - Proposed Seventh Floor Plan Block F
 - TF70P01 Rev 1A - Proposed First Floor Plan Block F
 - TF70P00 Rev 1A - Proposed Ground Floor Plan Block F
 - TG70P02 Rev 1A - Proposed Second Floor Plan Block G
 - TG70P03 Rev 1A - Proposed Third Floor Plan Block G
 - TG70P05 Rev 1A - Proposed Fifth Floor Plan Block G
 - TG70P04 Rev 1A - Proposed Fourth Floor Plan Block G
 - TG70P01 Rev 1A - Proposed First Floor Plan Block G
 - TG70P07 Rev 1A - Proposed Seventh Floor Plan Block G
 - TG70P10 Rev 1A - Proposed Tenth Floor Plan Block G
 - TG70P06 Rev 1A - Proposed Sixth Floor Plan Block G
 - TG70P00 Rev 1A - Proposed Ground Floor Plan Block G
 - TG70P08 Rev 1A - Proposed Eighth + Ninth Floor Plan Block
 - THJ70P02 Rev 1A - Proposed Second Floor Plan Blocks H-J.

THJ70P05 Rev 1A - Proposed Fifth Floor Plan Blocks H-J
 THJ70P01 Rev 1A - Proposed First Floor Plan Blocks H-J
 THJ70P04 Rev 1A - Proposed Fourth Floor Plan Blocks H-J
 THJ70P03 Rev 1A - Proposed Third Floor Plan Blocks H-J
 THJ70P00 Rev 1A - Proposed Ground Floor Plan Blocks H-J
 T20E02 Rev 1A - Elevation Sheet 2
 T20E21 Rev 1A - Elevation Sheet 1
 T20E23 Rev 1A - Elevation Sheet 3
 T20E05 Rev 1A - Elevation Sheet 5
 T20E25 Rev 1A - Elevation Sheet 5
 T20E03 Rev 1A - Elevation Sheet 3
 T20E22 Rev 1A - Elevation Sheet 2
 T20E26 Rev 1A - Elevation Sheet 6
 T20E24 Rev 1A - Elevation Sheet 4
 T20E01 Rev 1A - Elevation Sheet 1
 T20E06 Rev 1A - Elevation Sheet 6
 T20E04 Rev 1A - Elevation Sheet 4
 T20S01 Rev 1A - Proposed Massing Sections I
 T20S02 Rev 1A - Proposed Massing Sections LK.
 T20S03 Rev 1A - Proposed Massing Section J
 T20S04 Rev 1A - Proposed Massing Sections ABC
 T20S00 Rev 1A - Proposed Massing Sections GH
 T20S05 Rev 1A - Proposed Massing Sections CDF
 T20S04 Rev 1A - Proposed Massing Sections ABC(1)
 T20S03 Rev 1A - Proposed Massing Section J(1)
 T20S01 Rev 1A - Proposed Massing Sections I(1)
 T20S00 Rev 1A - Proposed Massing Sections GH(1)
 T20S02 Rev 1A - Proposed Massing Sections LK(1)
 T20S05 Rev 1A - Proposed Massing Sections CDF(1)
 T21D03 Rev 1A - Bay Elevation Detail Study 3
 T21D01 Rev 1A - Bay Elevation Detail Study 1
 T21D05 Rev 1A - Bay Elevation Detail Study 5
 T21D04 Rev 1A - Bay Elevation Detail Study 4
 T21D02 Rev 1A - Bay Elevation Detail Study 2
 T70D14 Rev 1A - Flat type 14
 T70D04 Rev 1A - Flat type 04
 T70D13 Rev 1A - Flat type 13
 T70D07 Rev 1A - Flat type 07
 T70D16 Rev 1A - Flat type 16
 T70D22 Rev 1A - Flat type 22
 T70D23 Rev 1A - Flat type 23
 T70D37 Rev 1A - Flat type 37
 T70D65 Rev 1A - Flat type 65
 T70D71 Rev 1A - Flat type 71
 T70D69 Rev 1A - Flat type 69
 T70D74 Rev 1A - Flat type 74
 T70D76 Rev 1A - Flat type 76
 Chailey Industrial Estate - Boundary Treatment Pla
 Chailey Industrial Estate - Daylight + Sunlight Nc
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 T10P00 - Existing Site Floor Plan.
 T10E01 - Existing Elevation Sheet 1
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 T10E05 - Existing Elevation Sheet 5
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 T20P03 Rev 1A - Proposed Third Floor Plan
 T20P07 Rev 1A - Proposed Seventh Floor Plan.
 T20P04 Rev 1A - Proposed Fourth Floor Plan
 T20P10 Rev 1A - Proposed Tenth Floor Plan
 T20P02 Rev 1A - Proposed Second Floor Plan
 T20P06 Rev 1A - Proposed Sixth Floor Plan
 T20P05 Rev 1A - Proposed Fifth Floor Plan.
 T20P01 Rev 1A - Proposed First Floor Plan-Podium Level
 TA70P02 Rev 1A - Proposed Second Floor Plan Block A
 TA70P01 Rev 1A - Proposed First Floor Plan Block A
 TA70P03 Rev 1A - Proposed Third Floor Plan Block A
 TA70P04 Rev 1A - Proposed Fourth Floor Plan Block A
 TA70P00 Rev 1A - Proposed Ground Floor Plan Block A
 TB70P02 Rev 1A - Proposed Second Floor Plan Block B
 TB70P03 Rev 1A - Proposed Third Floor Plan Block B
 TB70P00 Rev 1A - Proposed Ground Floor Plan Block B
 TB70P01 Rev 1A - Proposed First Floor Plan Block B
 Chailey Industrial Estate - Location Plan
 T20P08 Rev 1A Proposed Eighth and Ninth Floor Plan
 Air Quality Assessment Comments
 Air Quality Neutral Assessment
 T20P00 Rev 1B

Date Plans Received:	04/12/2018	Date(s) of Amendment(s):	20/03/2019
Date Application Valid:	11/12/2018		04/12/2018
			20/02/2019

1. SUMMARY

The application proposes the mixed use redevelopment of Chailey Industrial Estate to provide three buildings ranging from 2 to 11 storeys in height delivering 333 residential units and 710 sq.m of ground floor commercial floorspace (Use Classes A1, A2, A3, B1, D1 or D2), including the provision of private and communal amenity areas, child play space, car parking, secure cycle parking, refuse storage areas and other associated development.

The proposed development is considered an appropriate mix of uses, scale and built form that is well designed and will enhance the locality. The provision of additional residential units to the local area is supported by local policy and the London Plan (2016). The application is therefore recommended for approval.

2. RECOMMENDATION

1. That delegated powers be given to the Head of Planning, Transportation and Regeneration to grant planning permission subject to:

A) Entering into an agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) and/or S278 of the Highways Act 1980 (as amended) and/or other appropriate legislation to secure:

The obligations sought are as follows:

- 1. On-site Affordable Housing (including review mechanism)**
- 2. Pedestrian and Cycle improvements contribution of £250,000**
- 3. Grand Union Canal Quiet Way contribution of £50,000**
- 4. Healthy Streets contribution of £25,000**
- 5. Local Bus Services contribution of £25,000 each year for three years**
- 6. Carbon off-set contribution of £385,200**
- 7. Residential Travel Plan plus £20,000 bond**
- 8. Commercial Travel Plan plus £20,000 bond**
- 9. Car Club provision of two spaces**
- 10. Parking permits restriction for future occupiers**
- 11. Construction Training: A financial contribution to the sum of: Training costs: £2500 per £1m build cost plus Coordinator Costs - up to £9,600 per phase or an in kind scheme to be provided**
- 12. Highway Works: S278/S38 for required Highways Works**
- 13. Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions**

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/or 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) If the Legal Agreements have not been finalised by 4th August 2019 (or such other timeframe as may be agreed by the Head of Planning, Transportation and Regeneration), delegated authority be given to the Head of Planning, Transportation and Regeneration to refuse planning permission for the following reason:

'The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of affordable housing, public open space improvements, local bus services, carbon offset, travel plan, external amenity, construction training and highway works). The proposal therefore conflicts with Policies R17, AM2 and AM7 contained with the adopted Hillingdon Local Plan Saved Policies

(November 2012) and Policies 3.12 and 5.2 of the London Plan (2016).'

E. That if the application is approved, the following conditions be attached:

1 COM3 Time Limit

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 COM4 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:

T95P00 Rev 1A - Location Plan
T20P00 Rev 1B - Proposed Ground Floor Plan
T20P01 Rev 1A - First Floor Plan - Podium Level
T20P02 Rev 1A - Second Floor Plan
T20P03 Rev 1A - Third Floor Plan
T20P04 Rev 1A - Fourth Floor Plan
T20P05 Rev 1A - Fifth Floor Plan
T20P06 Rev 1A - Sixth Floor Plan
T20P07 Rev 1A - Seventh Floor Plan
T20P08 Rev 1A - Eighth and Ninth Floor Plans
T20P10 Rev 1A - Tenth Floor Plan
T20E01 Rev 1A - Elevation Sheet 1
T20E02 Rev 1A - Elevation Sheet 2
T20E03 Rev 1A - Elevation Sheet 3
T20E04 Rev 1A - Elevation Sheet 4
T20E05 Rev 1A - Elevation Sheet 5
T20E06 Rev 1A - Elevation Sheet 6
T20E21 Rev 1A - Elevation Sheet 1
T20E22 Rev 1A - Elevation Sheet 2
T20E23 Rev 1A - Elevation Sheet 3
T20E24 Rev 1A - Elevation Sheet 4
T20E25 Rev 1A - Elevation Sheet 5
T20E26 Rev 1A - Elevation Sheet 6
T20S00 Rev 1A - Proposed Massing Sections GH
T20S01 Rev 1A - Proposed Massing Sections I
T20S02 Rev 1A - Proposed Massing Sections LK
T20S03 Rev 1A - Proposed Massing Section J
T20S04 Rev 1A - Proposed Massing Sections ABC
T20S05 Rev 1A - Proposed Massing Sections CDF
T21D01 Rev 1A - Bay Elevation Detail Study 1
T21D02 Rev 1A - Bay Elevation Detail Study 2
T21D03 Rev 1A - Bay Elevation Detail Study 3
T21D04 Rev 1A - Bay Elevation Detail Study 4
T21D05 Rev 1A - Bay Elevation Detail Study 5
T70D04 Rev 1A - Flat Type 04, 1B2P
T70D07 Rev 1A - Flat Type 07, 2B4P
T70D13 Rev 1A - Flat Type 13, 1B2P
T70D14 Rev 1A - Flat Type 14, 2B3P
T70D16 Rev 1A - Flat Type 16, 1B2P

T70D22 Rev 1A - Flat Type 22, 2B3P
T70D23 Rev 1A - Flat Type 23, 1B2P
T70D37 Rev 1A - Flat Type 37, 2B3P
T70D65 Rev 1A - Flat Type 65, 1B2P
T70D69 Rev 1A - Flat Type 69, 2B3P
T70D71 Rev 1A - Flat Type 71, 1B2P
T70D74 Rev 1A - Flat Type 74, 2B3P
T70D76 Rev 1A - Flat Type 76, 1B2P
TA70P00 Rev 1A - Proposed Ground Floor Plan, Block A
TA70P01 Rev 1A - Proposed First Floor Plan, Block A
TA70P02 Rev 1A - Proposed Second Floor Plan, Block A
TA70P03 Rev 1A - Proposed Third Floor Plan, Block A
TA70P04 Rev 1A - Proposed Fourth Floor Plan, Block A
TB70P00 Rev 1A - Proposed Ground Floor Plan, Block B
TB70P01 Rev 1A - Proposed First Floor Plan, Block B
TB70P02 Rev 1A - Proposed Second Floor Plan, Block B
TB70P03 Rev 1A - Proposed Third Floor Plan, Block B
TC70P00 Rev 1A - Proposed Ground Floor Plan, Block C
TC70P01 Rev 1A - Proposed First Floor Plan, Block C
TC70P02 Rev 1A - Proposed Second Floor Plan, Block C
TC70P03 Rev 1A - Proposed Third Floor Plan, Block C
TC70P04 Rev 1A - Proposed Fourth Floor Plan, Block C
TC70P05 Rev 1A - Proposed Fifth Floor Plan, Block C
TD70P00 Rev 1A - Proposed Ground Floor Plan, Block D
TD70P01 Rev 1A - Proposed First Floor Plan, Block D
TD70P02 Rev 1A - Proposed Second Floor Plan, Block D
TD70P03 Rev 1A - Proposed Third Floor Plan, Block D
TD70P04 Rev 1A - Proposed Fourth Floor Plan, Block D
TD70P05 Rev 1A - Proposed Fifth Floor Plan, Block D
TD70P06 Rev 1A - Proposed Sixth Floor Plan, Block D
TE70P00 Rev 1A - Proposed Ground Floor Plan, Block E
TE70P01 Rev 1A - Proposed First Floor Plan, Block E
TE70P02 Rev 1A - Proposed Second Floor Plan, Block E
TE70P03 Rev 1A - Proposed Third Floor Plan, Block E
TE70P04 Rev 1A - Proposed Fourth Floor Plan, Block E
TE70P05 Rev 1A - Proposed Fifth Floor Plan, Block E
TE70P06 Rev 1A - Proposed Sixth Floor Plan, Block E
TF70P00 Rev 1A - Proposed Ground Floor Plan, Block F
TF70P01 Rev 1A - Proposed First Floor Plan, Block F
TF70P02 Rev 1A - Proposed Second Floor Plan, Block F
TF70P03 Rev 1A - Proposed Third Floor Plan, Block F
TF70P04 Rev 1A - Proposed Fourth Floor Plan, Block F
TF70P05 Rev 1A - Proposed Fifth Floor Plan, Block F
TF70P06 Rev 1A - Proposed Sixth Floor Plan, Block F
TF70P07 Rev 1A - Proposed Seventh Floor Plan, Block F
TG70P00 Rev 1A - Proposed Ground Floor Plan, Block G
TG70P01 Rev 1A - Proposed First Floor Plan, Block G
TG70P02 Rev 1A - Proposed Second Floor Plan, Block G
TG70P03 Rev 1A - Proposed Third Floor Plan, Block G
TG70P04 Rev 1A - Proposed Fourth Floor Plan, Block G
TG70P05 Rev 1A - Proposed Fifth Floor Plan, Block G
TG70P06 Rev 1A - Proposed Sixth Floor Plan, Block G
TG70P07 Rev 1A - Proposed Seventh Floor Plan, Block G

TG70P08 Rev 1A - Proposed Eighth & Ninth Floor Plan , Block G
TG70P10 Rev 1A - Proposed Tenth Floor Plan, Block G
THJ70P00 Rev 1A - Proposed Ground Floor Plan, Block H-J-Affordable
THJ70P01 Rev 1A - Proposed First Floor Plan, Block H-J
THJ70P02 Rev 1A - Proposed Second Floor Plan, Block H-J-Affordable
THJ70P03 Rev 1A - Proposed Third Floor Plan, Block H-J
THJ70P04 Rev 1A - Proposed Fourth Floor Plan, Block H-J
THJ70P05 Rev 1A - Proposed Fifth Floor Plan, Block H-J
C0075 L100 - Ground Floor Landscape General Arrangement
C0075 L101 - First Floor Landscape General Arrangement
C0075 L102 - Ground Floor Coloured Masterplan
C0075 L103 - First Floor Coloured Masterplan
9938-KC-XX-YTREE-TCP01Rev0 - Tree Constraints Plan; and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (2016).

3 COM5 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:

Design and Access Statement

Noise Impact Assessment (November 2018)

Daylight, Sunlight and Overshadowing Report (November 2018)

Archaeological Desk Based Assessment (January 2018)

Desk Study and Ground Investigation (November 2018)

Heritage Impact Assessment (November 2018)

Planning Statement (November 2018)

Sustainability Statement (November 2018)

Verified Views (November 2018)

Wind Microclimate (November 2018)

Affordable Housing Statement (December 2018)

Air Quality Assessment (November 2018)

Low Emissions Strategy (November 2018)

Ecological Appraisal (November 2018)

Energy Statement (November 2018)

Flood Risk Assessment (November 2018)

Transport Assessment (April 2018)

Tree Survey (January 2018)

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 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and the London Plan (2016).

4 COM7 Materials (Submission)

Prior to above ground works, details of all materials and external surfaces, including details of balconies, 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.

Details should include information relating to 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 COM9 Landscaping (car parking & refuse/cycle storage)

Prior to above ground works, a landscape scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping

- 1.a Planting plans to include pollution absorbing semi mature trees (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 Means of enclosure/boundary treatments
- 2.c Car Parking Layouts (including 3 commercial parking spaces, 204 residential parking spaces, 2 car club parking spaces and demonstration that 41 car parking spaces (20%) are served by active electrical charging points, 112 car parking spaces (54% as proposed) are served by passive electrical charging points, 34 accessible car parking spaces, 10 motorcycle spaces and 557 cycle spaces)
- 2.d Hard Surfacing Materials
- 2.e External Lighting
- 2.f 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 surfing/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

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 (2016).

6 COM6 Levels

Prior to above ground works, plans of the site showing the existing and proposed ground

levels and the proposed finished floor levels of all proposed buildings shall be 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).

7 COM15 Sustainable Water Management

Prior to commencement (excluding demolition and site clearance) a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall follow the strategy set out in the submitted letter dated 21st September from GTA Civils. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site by providing information on:

a) Suds features

- i. incorporating sustainable urban drainage (SuDs) in accordance with the hierarchy set out in Policy 5.15 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided,
- ii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus Climate change. This rate should be presented per hectare as well as the total for the whole site.
- iii. where it is intended to have above ground storage, overland flooding should be mapped, both designed and exceedance routes above the 100, plus climate change, including flow paths depths and velocities identified as well as any hazards, (safe access and egress must be demonstrated).
- iv. Where infiltration techniques (soakaway) a site investigation must be provided to establish the level of groundwater on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).

b) Minimise water use

- i. incorporate water saving measures and equipment.
- ii. provide details of how rain and or grey water will be recycled and reused in the development.

c) Long Term Management and Maintenance of the drainage system

- i. Provide a management and maintenance plan
- ii. Include details of Inspection regimes, performance specification, (remediation and timescales for the resolving of issues where a PMC).
- iii. Where overland flooding is proposed, the plan should include the appropriate actions to define those areas and actions required to ensure the safety of the users of the site should that be required.
- iv. Clear plans showing all of the drainage network above and below ground. The responsibility of different parties such as the landowner.

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 that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to: Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy 5.12 Flood Risk Management of the London Plan (March 2016) and To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016), and Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016). National Planning Policy Framework (July 2018), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

8 COM20 Air extraction system noise and odour

Prior to use, machinery, plant or equipment, including the extract/ ventilation system and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

REASON

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

9 NONSC External Plant Noise Level

The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background noise level by at least 5dBA as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

REASON

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

10 NONSC Internal Noise Level

The noise level in habitable residential rooms at the development hereby approved shall meet the internal noise standard specified in BS8233:2014.

REASON

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by road traffic and other noise in accordance with policies OE1 and OE5 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

11 NONSC External Amenity Area Noise Level

The noise level within external amenity areas at the development hereby approved shall meet the noise standard specified in BS8233:2014.

REASON

To ensure that the amenity of the occupiers of the proposed development is not adversely affected by road traffic and other noise in accordance with policies OE1 and OE5 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

12 NONSC Sound Insulation

The approved development shall have an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings, namely living room and kitchen above bedroom of separate dwelling. Approved details shall be implemented prior to occupation of the development and thereafter be permanently

retained.

REASON

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

13 COM22 Operating Hours

The commercial premises shall not be open for customers outside the following hours: -
0800 and 2300 Mondays - Fridays
0800 to 2300 Saturdays
1000 to 1800 Sundays, Public or Bank Holidays.

REASON

To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy OE3 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

14 COM25 Loading/unloading/deliveries

There shall be no loading or unloading of commercial vehicles, including the collection of waste from the site outside of the hours of:-

0700 and 2300 hours, Monday to Saturday, and
09:00 and 18:00 hours on Sundays, Public or Bank Holidays.

REASON

To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy OE3 Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012).

15 NONSC Non Standard Condition

The commercial units hereby approved, shall not be used as a religious or any other associated cultural facility or banqueting hall, health centre or day nursery unless approved in writing by the Local Planning Authority. Furthermore no units shall be amalgamated or subdivided without approval in writing by the local planning authority.

REASON

To prevent local highway impact in accordance with Policy R9 of the Local Plan: Part Two (November 2012).

16 COM30 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.

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).

17 NONSC Imported Soils

No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. All imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted to and approved in writing by the Local Planning Authority.

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 Local Plan: Part Two Saved UDP Policies (November 2012).

18 NONSC Architectural Solution/Privacy 1

Notwithstanding the submitted details, no development shall take place above ground level until details of an architectural solution (such as oriel windows) for the bedroom windows in the northern elevation of Block H that face towards the southern elevation of Block G to protect future resident's privacy 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 shall be retained as such.

REASON

To ensure that the development provides an acceptable level of residential privacy in accordance with Policy BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

19 NONSC Architectural Solution/Privacy 2

Notwithstanding the submitted details, no development shall take place above ground level until details of an architectural solution (such as privacy screening) for the access stair to the southern part of the parking podium for Blocks A and B to protect existing resident's privacy 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 shall be retained as such.

REASON

To ensure that the development provides an acceptable level of residential privacy in accordance with Policy BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

20 NONSC Podium Privacy Solution

Notwithstanding the submitted details, no development shall take place above ground level until full details of the proposed landscaping and/or architectural solution for the podium area to the rear of Blocks A and B to protect existing resident's privacy on Little Road 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 shall be retained as such.

REASON

To ensure that the development provides an acceptable level of residential privacy in accordance with Policy BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

21 COM31 Secured by Design

The buildings and all car park areas 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 building shall be occupied until accreditation has been achieved.

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 (2016) Policies 7.1 and 7.3.

22 NONSC Low and Zero Carbon Technology

Prior to above ground works, full details of the low and zero carbon technology shall be submitted to and approved in writing by the Local Planning Authority. The details following requirements must demonstrate compliance with the reductions set out in the Energy Assessment (ref LEC 3009/R01_2 Low Energy Consultancy Ltd, 29 November 2018).

- 1 - Details of the CHP should also include the heat network, the plant type and its location. Full details of the fuel inputs and energy outputs shall also be presented.
- 2 - Details of the PVs, including fixing mechanisms, pitch, orientation and plans (roof and elevations) shall also be included.

The development must proceed in accordance with the approved plans.

REASON

To ensure the proposals contribute to a reduction in CO2 in accordance with London Plan (2016) Policy 5.2.

23 NONSC Radar Mitigation Scheme 1

No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with NATS (En Route) plc and approved in writing by the Local Planning Authority.

REASON

In the interests of aircraft safety in compliance with Policy A6 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

24 NONSC Radar Mitigation Scheme 2

No construction work shall be carried out above 12m above ground level unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON

In the interests of aircraft safety in compliance with Policy A6 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

25 NONSC Crane Operation Plan

Prior to the commencement of development, full details of a "Crane Operation Plan" shall be submitted to and approved in writing by the Local Planning Authority in consultation with the "Radar Operator" (NATS) and BAA Safeguarding. Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON

In the interests of aircraft safety in compliance with Policy A6 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

26 NONSC Bird Hazard Management Plan

Prior to commencement of works above damp proof course level a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

- Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Hazards from Building Design'.

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

REASON

In the interests of aircraft safety in compliance with Policy A6 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

27 NONSC Piling

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON

To prevent any detrimental impact on local underground sewerage utility infrastructure and/or contamination of controlled waters from existing land mobilised by the building work and new development in accordance with policy OE11 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

28 NONSC Written Scheme of Investigation

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

REASON

Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with Policy BE3 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

29 NONSC Construction Environmental Management Plan

Before the development hereby approved commences, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by, the Local Planning Authority. The CEMP shall comprise such combination of measures for controlling the effects of demolition, construction and enabling works associated with the development as may be approved by the Local Planning Authority. The CEMP shall address issues including the phasing of the works, hours of work, noise and vibration, air quality, waste management, site remediation, plant and equipment, site transportation and traffic management including routing, signage, permitted hours for construction traffic and construction materials deliveries. It will ensure appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction. Appropriate arrangement should be made for monitoring and responding to complaints relating to demolition and construction. All demolition, construction and enabling work at the development shall be carried out in accordance with the approved CEMP unless otherwise agreed in writing by the LPA.

REASON

To safeguard the amenity of surrounding areas in accordance with policy OE5 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

30 NONSC Parking Allocation Plan

Prior to occupation of the development, a Parking Allocation Plan shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the parking shall be for residential use of the flats and ancillary commercial use hereby approved and as agreed

within the Parking Allocation Plan unless otherwise agreed in writing by the Local Planning Authority.

REASON

To ensure availability and management of parking, in accordance with policies AM2, AM7 and AM14 of the Hillingdon Local Plan: Part 2 Saved UDP Policies (Nov 2012) and policies 6.3 and 6.13 of the London Plan (2016).

31 NONSC Traffic Arrangements

Development shall not begin (excluding demolition and site clearance) 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 (2016)

32 NONSC Emergency Access

The development shall not be occupied until details of access arrangements for emergency vehicles from Chalfont Road into the site, 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.

REASON

To ensure that the development provides acceptable access arrangements for emergency vehicles in accordance with Policy 7.2 of the London Plan (2016).

33 NONSC No Roof Gardens

Access to the flat roof areas not within private balconies or terraces hereby approved shall be for maintenance or emergency purposes only and the flat roofs shall not be used as a roof garden, terrace, balcony, patio or similar amenity area.

REASON

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

34 NONSC Servicing and Refuse Collection Strategy

Prior to occupation of the development, a Servicing and Refuse Collection Strategy shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, servicing and collection shall be carried out as agreed within this approved plan unless otherwise agreed in writing by the Local Planning Authority.

REASON

To ensure appropriate servicing of the site, to safeguard highway safety, and to safeguard the free flow of traffic, in accordance with policies AM2, AM7 and AM14 of the Hillingdon

Local Plan: Part 2 Saved UDP Policies (Nov 2012) and policy 6.3 of the London Plan (2016).

35 NONSC Homezone

Before the development hereby approved is occupied, a Homezone Plan shall be submitted to, and approved in writing by, the Local Planning Authority. The detailed plan shall demonstrate how the proposed Home Zone:

- a. successfully alerts motorists, cyclists and pedestrians to the shared surface environment;
- b. achieves clear wayfinding for blind and partially sighted people; a design that minimises the risk of blind people straying into the path of moving vehicles;
- c. rationalises use of bollards and similar obstacles;
- d. defines car spaces to ensure vehicles are parked only in designated places;
- e. introduces measures that force slow vehicle movement;
- f. would be legible to aid navigation; it should be possible to easily differentiate one area of the development from another.

Details of a drop-off point for door-to-door service providers, to include large Dial-A-Ride vehicles, should be provided or justification as to why no part of the development can include a drop-off point.

REASON

To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 d, is achieved and maintained.

36 NONSC M4(2)/M4(3) Dwellings

The development hereby approved shall ensure that 10% (34) of the residential units are constructed to meet the standards for Category 3 M4(3) dwelling (including 9 of the affordable housing units) with a floor plan at no less than 1:100 submitted for each of the different M4(3) units and agreed in writing by the Local Planning Authority. All details, to include transfer zones, wheelchair storage area, and other spatial requirements within bedrooms, bathrooms, living and dining areas, should be shown on a separate plan for every different unit type. All remaining units designed to the standards for Category 2 M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building.

REASON

To ensure an appropriate standard of housing stock in accordance with London Plan Policy 3.8 d, is achieved and maintained.

37 NONSC Accessible Play Equipment

Prior to occupation of the development, details in respect of the play equipment accessible to disabled children, including those with a sensory impairment, or complex multiple disabilities, shall be submitted and approved in writing by the Local Planning Authority. Furthermore all areas of hard and soft landscaping shall be constructed to accord with the prescribed standards and tolerances set out in BS8300:2018.

REASON

To ensure development achieves a high standard of inclusive design in accordance with London Plan policy 7.2.

38 NONSC Estate Management

Prior to the first occupation of any residential units, details of an Estate Management Plan

shall be submitted and approved in writing by the LPA. Details shall include, but not be limited to the control of parking, maintenance of the publicly accessible areas and maintenance of all blocks within the estate.

REASON

To safeguard the living environment of the future residential occupiers in compliance with policies BE13, BE38 and AM14 Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

INFORMATIVES

1 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).

2 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 - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

AM13	AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): - (i) Dial-a-ride and mobility bus services (ii) Shopmobility schemes (iii) Convenient parking spaces (iv) Design of road, footway, parking and pedestrian and street furniture schemes
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.
AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE13	New development must harmonise with the existing street scene.
BE18	Design considerations - pedestrian security and safety
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.
BE25	Modernisation and improvement of industrial and business areas
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE4	New development within or on the fringes of conservation areas
BE10	Proposals detrimental to the setting of a listed building
LPP 2.13	(2016) Opportunity Areas and Intensification Areas
LPP 2.17	(2016) Strategic Industrial Locations
LPP 2.6	(2016) Outer London: vision and strategy
LPP 2.7	(2016) Outer London: Economy
LPP 2.8	(2016) Outer London: Transport
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.1	(2016) Developing London's economy
LPP 4.2	(2016) Offices
LPP 4.3	(2016) Mixed use development and offices
LPP 4.4	(2016) Managing Industrial Land and Premises
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 5.6	(2016) Decentralised Energy in Development Proposals
LPP 5.7	(2016) Renewable energy
LPP 5.8	(2016) Innovative energy technologies
LPP 6.1	(2016) Strategic Approach
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.7	(2016) Better Streets and Surface Transport
LPP 6.9	(2016) Cycling
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 7.7	(2016) Location and design of tall and large buildings

LPP 7.8	(2016) Heritage assets and archaeology
LPP 7.9	(2016) Heritage-led regeneration
LPP 8.1	(2016) Implementation
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy
OE1	Protection of the character and amenities of surrounding properties and the local area
OE11	Development involving hazardous substances and contaminated land - requirement for ameliorative measures
OE3	Buildings or uses likely to cause noise annoyance - mitigation measures
OE5	Siting of noise-sensitive developments
R17	Use of planning obligations to supplement the provision of recreation leisure and community facilities
R7	Provision of facilities which support arts, cultural and entertainment activities

3 170 LBH worked applicant in a positive & proactive (Granting)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from the 'Saved' UDP 2007, Local Plan Part 1, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

4 173 Community Infrastructure Levy (CIL) (Granting Consent)

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

5 115 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 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

Heathrow Airport Limited (HAL) have provided the following information:

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airside Operations staff. In some instances it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

7

The Greater London Archaeological Advisory Service (GLAAS) have provided the following information:

Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

8

Thames Water have provided the following information:

Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."

9 113 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).

3. CONSIDERATIONS

3.1 Site and Locality

The application site area measures approximately 1.8ha and is currently occupied by a number of single and double storey commercial buildings providing warehouse units, an office building and a central area used as a coach depot and storage area with vehicle servicing/MOT centre element, plus associated hardstanding and parking.

The site is bounded by Pump Lane to the north, a retail warehouse and associated parking to the east, small scale commercial premises to the south and two storey residential properties to the south and west on Little Road and Chalfont Road. There are further two storey residential properties to the north on the opposite side of Pump Lane. Vehicular access is off Pump Lane and there is a further closed access to the northern end of Chalfont Road.

The site is within close proximity to Hayes Town Centre and to Hayes and Harlington Railway station. The area is mixed use in character and is not within a Conservation Area or an Area of Special Local Character. There are no listed buildings within or directly adjacent to the site, however the Grade II Listed Benlow Works building and the locally listed Silverdale Road warehouses are located to the south of the site. The site is within an Air Quality Focus Area as defined by the GLA (Focus Area 85, Hayes Town Botwell Lane/Pump Lane) and included within the Hillingdon Hayes Air Quality Focus Area.

The application site lies in an area of archaeological interest and has a PTAL rating of 2/3. The current Chailey Industrial Estate forms part of the Pump Lane Industrial Business Area and is developed land as designated by the Hillingdon Local Plan (November 2012).

3.2 Proposed Scheme

The scheme proposes the demolition of all of the existing buildings within the site boundary to provide three new apartment blocks from two to eleven storeys. The new buildings will provide 333 residential units, together with secure vehicle parking, cycle storage, refuse and plant areas. Three new commercial units are proposed to be located on the primary Pump Lane frontage wrapping around the east elevation.

The 333 apartments across the buildings are proposed in the following mix:

- Studio x 29 units
- 1 Bedroom x 88 units
- 2 Bedroom 3 Person x 48 units
- 2 Bedroom 4 Person x 113 units
- 3 Bedroom x 55 units

There are 34 accessible flats proposed (10% of total) with each wheelchair accessible flat proposed to have an allocated disabled parking space.

There are 209 car parking spaces proposed as follows:

- 3 commercial parking spaces
- 204 residential parking spaces
- 2 car club parking spaces

There are 549 residential + 8 Visitor secure cycle storage spaces proposed, these are located in 10 storage areas across the site. In addition 11 cycle spaces are proposed for the commercial units.

3 employment units are proposed, totalling 710sqm of flexible commercial floorspace (A1/A1/A3/B1/D1 and D2) at ground floor fronting Pump Lane and wrapping around the eastern boundary adjacent to the neighbouring Matalan site.

The proposal comprises three buildings that range from 2 to 11 storeys. These buildings are subdivided in blocks within the proposed plans to enable clarity of the development proposed.

The western building comprises Blocks A and B, with Block A rising to a maximum of 5 storeys along Pump Lane, whereas Block B steps down to 2 storeys where it is adjacent to the property at the northern end of Chalfont Road (No. 20). The building is linear with active frontages presented to Pump Lane and towards the internal proposed 'Home Zone'. Duplex units have been created to assist in activating this frontage with access doors onto the streetscene as opposed to central access cores. Parking is proposed to the rear/west with

a podium providing external amenity space above. Landscaping is proposed along the edge of the podium area to prevent overlooking and protect the privacy of adjacent occupiers.

The largest of the three buildings comprises Blocks C to G and varies in height between 6-8 storeys along the Pump Lane frontage and rises up to the highest point at 11 storeys in the south east corner. This block is roughly square shaped and includes a large central parking area with podium external amenity area above. Duplex units have again been included to activate the western and southern elevations. This building (within Blocks D, E and F) includes the proposed commercial units at ground floor level along the Pump Lane frontage and the eastern section closest to the adjacent Matalan store.

The smaller building towards the south eastern corner of the site comprises 4 and 6 storey elements. This building includes Blocks H and J with parking proposed externally to the west. To the east of the block an area of landscaping is proposed.

The massing of the scheme has been designed to relate to the streetscape and townscape of its surroundings with the tallest part of the development being proposed towards the commercial properties along the eastern boundary of the site and lower elements adjacent the established residential properties along Chalfont and Little Road. The majority of the scheme will be masonry construction to tie in to the surrounding area.

Overall, the proposal will deliver a total of 8,561sqm of amenity space, with the majority (3,247sqm) of this space being provided at ground floor level with a further 2,506sqm provided at podium level and 2,808sqm as private balconies and terraces. The scheme has evolved through the pre-application process to introduce a significant level of soft landscaping within the heart of the development and a large landscaped buffer along the eastern edge against the existing industrial uses.

The main entrances to the development is from the existing access from Pump Lane. In order to open up the site to the surrounding area as well as safeguarding future links through the adjacent Matalan site a number of pedestrian routes are provided across the site. Including the provision of pedestrian access to Silverdale Road and Chalfont Road from Pump Lane. A shared surface area is proposed within the centre of site to reduce traffic speeds and create a residential character akin to the neighbouring residential roads.

3.3 Relevant Planning History

Comment on Relevant Planning History

The site has no directly relevant planning history to the current proposals.

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.CI2	(2012) Leisure and Recreation
PT1.E1	(2012) Managing the Supply of Employment Land
PT1.E6	(2012) Small and Medium-Sized Enterprises (SME)
PT1.E7	(2012) Raising Skills
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM5	(2012) Sport and Leisure
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.H1	(2012) Housing Growth
PT1.HE1	(2012) Heritage
PT1.T1	(2012) Accessible Local Destinations

Part 2 Policies:

AM13	AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate): - (i) Dial-a-ride and mobility bus services (ii) Shopmobility schemes (iii) Convenient parking spaces (iv) Design of road, footway, parking and pedestrian and street furniture schemes
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.
AM8	Priority consideration to pedestrians in the design and implementation of road construction and traffic management schemes
AM9	Provision of cycle routes, consideration of cyclists' needs in design of highway improvement schemes, provision of cycle parking facilities
BE13	New development must harmonise with the existing street scene.
BE18	Design considerations - pedestrian security and safety
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.
BE25	Modernisation and improvement of industrial and business areas
BE3	Investigation of sites of archaeological interest and protection of archaeological remains
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE4	New development within or on the fringes of conservation areas
BE10	Proposals detrimental to the setting of a listed building
LPP 2.13	(2016) Opportunity Areas and Intensification Areas
LPP 2.17	(2016) Strategic Industrial Locations
LPP 2.6	(2016) Outer London: vision and strategy
LPP 2.7	(2016) Outer London: Economy
LPP 2.8	(2016) Outer London: Transport
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.1	(2016) Developing London's economy
LPP 4.2	(2016) Offices
LPP 4.3	(2016) Mixed use development and offices
LPP 4.4	(2016) Managing Industrial Land and Premises
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 5.6	(2016) Decentralised Energy in Development Proposals
LPP 5.7	(2016) Renewable energy
LPP 5.8	(2016) Innovative energy technologies
LPP 6.1	(2016) Strategic Approach
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.7	(2016) Better Streets and Surface Transport

- LPP 6.9 (2016) Cycling
- LPP 7.1 (2016) Lifetime Neighbourhoods
- LPP 7.15 (2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
- LPP 7.2 (2016) An inclusive environment
- LPP 7.3 (2016) Designing out crime
- LPP 7.4 (2016) Local character
- LPP 7.5 (2016) Public realm
- LPP 7.6 (2016) Architecture
- LPP 7.7 (2016) Location and design of tall and large buildings
- LPP 7.8 (2016) Heritage assets and archaeology
- LPP 7.9 (2016) Heritage-led regeneration
- LPP 8.1 (2016) Implementation
- LPP 8.2 (2016) Planning obligations
- LPP 8.3 (2016) Community infrastructure levy
- OE1 Protection of the character and amenities of surrounding properties and the local area
- OE11 Development involving hazardous substances and contaminated land - requirement for ameliorative measures
- OE3 Buildings or uses likely to cause noise annoyance - mitigation measures
- OE5 Siting of noise-sensitive developments
- R17 Use of planning obligations to supplement the provision of recreation, leisure and community facilities
- R7 Provision of facilities which support arts, cultural and entertainment activities

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- 13th January 2019

5.2 Site Notice Expiry Date:- 1st February 2019

6. Consultations

External Consultees

Consultation letters were sent to 198 local owner/occupiers on 18/12/18. The application was also advertised by way of site and press notices. The following responses have been received:

- 1 petition in objection to the proposals
- 18 comments in objection
- 12 comments in support

The petition in objection to the proposals has 38 signatures and states:

'With reference to the above planning permission...we the residents/occupants of Chalfont Road... and Little Road..ALL OBJECT to this application for the following reasons:

- High Rise building hazard/safety big issues impact on houses for both roads
- Loss of light/overlooking

- Loss of privacy
 - Traffic generation (Congestion)
 - Increase in Crime
 - Noise disturbance as a result of use
 - Inadequacy of parking
 - Increased pollution/smells infestation
 - Loss of trees
 - Damage to the Environment
 - Vulnerability to the surroundings
 - Chalfont Road is a small Cul-de-sac of 20 houses, we do not want public access to our road as parking is restricted
 - Little Road has 38 houses already congested with restricted parking
- These buildings which will be demolished are old and may have poisonous substances i.e. asbestos and infestation of rats/mice etc. which will cause damage to health of residents. With public interest in mind the value of our properties will decrease.'

Eighteen comments of objection to the proposal have been received. The concerns raised can be summarised as:

- Loss of light/Overshadowing
- Increased traffic and congestion
- Road Safety
- Increased crime/anti-social behaviour
- Noise pollution
- Loss of employment opportunities and infrastructure
- Impact on residential amenity
- Loss of Privacy
- Will create a more commercialised environment
- Inappropriate design
- Over development/density
- Height is out of character/unsympathetic
- No precedent has been set in the immediate vicinity
- Detrimental impact on residents enjoyment of their homes
- Overdevelopment
- Poor public consultation
- Possible for residents to throw things into my garden or onto the roof my garage
- Road leading from Chalfont to the development should have through access for Council refuse collection
- Road leading from Chalfont to the development should have no through access due to crime/anti-social behaviour
- Open space should be created on the development for children and families
- No provision for a community centre
- Flawed/biased methodology for sunlight report
- Impact on property values
- Scheme is 'social cleansing', 'institutional oppression' and risks a 'liberation movement'
- Pressure on Schools/Nurseries/GP/Dentist services
- Parking stress
- Adverse impact on visual amenity
- Oppressive
- There should be NO development allowed
- Increased dirt and litter
- Absolutely disgusting money making ploy
- Too many flats, should be housing
- Air pollution

Twelve comments in support of the proposal have been received. The concerns raised can be summarised as:

- Good for the town and local community
- Good for business
- Appropriate for residential
- More housing options
- Need for affordable housing in Hayes
- Improved access to the canal path
- Will greatly reduce crime
- Clean up the area from its historical industrious state
- We will appreciate the trucks no longer going along pump lane
- It will help the area to have these flats.

Member of Parliament (MP) for Hayes

Although there is a clear need for additional housing within the area it is critically important that homes are provided that are genuinely affordable and preferably council houses, with a balance in favour of family accommodation which is in such short supply in our community. Strong concerns have been raised by my constituents about the density of this accommodation. Constituents have described the need for social provision to support the educational, health and social care and policing needs of the additional population associated with the new development. Constituents have expressed their view that there is a need to ensure that any new developments are carbon neutral to assist in the tackling of climate change and that no new developments add to the traffic and air pollution problems suffered within our local area.

Case Officer's comments:

The need for additional housing is noted. Considerations relating to the level of affordable housing, housing mix, density, s106 obligations and CIL payments, sustainability, traffic and air quality are covered within the relevant sections of this report.

NATIONAL AIR TRAFFIC SERVICES (NATS)

I refer to the application quoted above. NATS has assessed the proposal and has identified the potential for an impact upon its infrastructure, namely its H10 radar located at Heathrow Airport. NATS has evidence of buildings in the vicinity causing an impact to its infrastructure which it has taken measures to manage. Due to insufficient detail around the final design of the buildings as well as in relation to neighbouring schemes, NATS has concerns over the planning application in question. The current application may benefit from the shielding provided by other construction, however as NATS has been unable to verify this, it wishes to object to the application unless the planning conditions reproduced overleaf are imposed. Should the applicant be able to demonstrate that the scheme is shielded by similar buildings, obstructing the line of sight to the H10 radar, NATS will be in a position to withdraw its objection. Alternatively, a radar mitigation scheme can be agreed with NATS.

Radar Mitigation Scheme

1. Prior to the commencement of development of any phase of development, the following shall be submitted to and approved in writing by the Local Planning Authority and by the Radar Operator - NATS (En-route) plc either;

- detailed plans for the proposed buildings in that individual phase, demonstrating that there would be no detrimental impact upon the operation of the Heathrow H10 SSR Radar;

OR,

- details of a 'Radar Mitigation Scheme' (including a timetable for its implementation during construction) to mitigate any detrimental impact upon the Heathrow H10 SSR Radar.

2. Where a 'Radar Mitigation Scheme' has been required, no construction above 12m above ground level (AGL) shall take place on site, unless the 'Radar Mitigation Scheme' has been implemented.

Development shall not take place other than in complete accordance with such a scheme as so approved unless the planning authority and NATS (En-route) plc have given written consent for a variation.

Reason: In the interests of Air Traffic Safety and of the operations of NATS En-route PLC.

Crane Operation Plan

3. Prior to the commencement of development within the Industrial development hereby approved, full details of a "Crane Operation Plan" shall be submitted to and approved in writing by the Local Planning Authority in consultation with the "Radar Operator" (NATS) and BAA Safeguarding. Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

Reason: In the interests of Air Traffic Safety and of the operations of NATS En-route PLC.

For the purpose of conditions 1-3 above;

"Operator" means NATS (En Route) plc, incorporated under the Companies Act (4129273) whose registered office is 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL or such other organisation licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services to the relevant managed area (within the meaning of section 40 of that Act). "Radar Mitigation Scheme" or "Scheme" means a detailed scheme agreed with the Operator which sets out the measures to be taken to avoid at all times the impact of the development on the H10 Primary and Secondary Surveillance radar and air traffic management operations of the Operator. "Crane Operation Plan (COP)" means a detailed plan agreed with the Operator which defines the type of crane and the timing and duration of all crane works to be carried out at the site in order to manage and mitigate at all times the impact of the development on the H10 Primary and Secondary Surveillance Radar systems at Heathrow Airport and associated air traffic management operations of the Operator.

HEATHROW AIRPORT LTD

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the conditions detailed below:

H10 Radar Mitigation Condition

No Development can take place until:

- mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 Radar at Heathrow Airport.

Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through interference with communication, navigational aids and surveillance equipment.

Submission of a Bird Hazard Management Plan

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

- Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds.

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: It is necessary to manage the flat roofs to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport.

Information

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airside Operations staff. In some instances it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observations:

Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aoa.org.uk/policy-safeguarding.htm>)

Landscaping

The development is close to the airport and the landscaping which is includes may attract birds which in turn may create an unacceptable increase in bird strike hazard. Any such landscaping should, therefore, be carefully design to minimise its attraction to hazard species of birds. Your attention is drawn to Advice Note 3, 'Potential Bird Hazards: Amenity Landscaping and Building Design' (available at <http://www.aoa.org.uk/operation&safety/safeguarding.htm>)

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Case Officer's comments:

Both NATS and HAL have requested similar conditions with regards to the H10 Radar at Heathrow. To avoid repetition a set of conditions have been proposed by the case officer to cover the above requirements that have been agreed as acceptable in writing by both NATS and HAL. These conditions are recommended to be attached to any grant of planning consent.

CADENT GAS NETWORK

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified. Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application. If the application is refused for any other reason than the presence of apparatus, we will not take any further action.

Please let us know whether Plant Protection can provide you with technical or other information that

may be of assistance to you in the determination of the application. Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your scheduled activities at this location. It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near Cadent and/or National Grid's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to Cadent Gas Limited, National Grid Electricity Transmission plc (NGET) and National Grid Gas Transmission plc (NGGT) and apparatus. This assessment does NOT include:

- Cadent and/or National Grid's legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent and/or National Grid's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Plant Protection.
- Gas service pipes and related apparatus
- Recently installed apparatus
- Apparatus owned by other organisations, e.g. other gas distribution operators, local electricity companies, other utilities, etc.

It is YOUR responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities. Further "Essential Guidance" in respect of these items can be found on either the National Grid or Cadent website. This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to Cadent and/or National Grid's easements or wayleaves nor any planning or building regulations applications.

Case Officer's comments:

The above comments have been provided to the applicants.

NATURAL ENGLAND

Natural England has no comments to make on this application.

THAMES WATER

Waste Comments

Thames Water would advise that with regard to surface water network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to Foul Water sewage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided

The proposed development is located within 15m of a strategic sewer. Thames Water request that the following condition be added to any planning permission:

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the

terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure.

Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company.

HIGHWAYS ENGLAND

Referring to the notification of a planning application dated 18 December 2018 referenced above, in the vicinity of the M4 Junction 3 that forms part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we offer no objection.

ENVIRONMENT AGENCY

Thank you for consulting us on the above application. We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.

We recommend, however, that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be in addition to the risk to human health that your Environmental Health Department will be looking at.

EALING COUNCIL

Ealing Council raises no objection to the proposal.

HISTORIC ENGLAND - GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (GLAAS) NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological

interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

The planning application lies in an area of archaeological interest. If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The archaeological desk-based assessment (DBA) that accompanies this application suggests that archaeological mitigation is not appropriate but I do not agree. The DBA says the site has low archaeological potential partly due to severe, widespread and cumulative impacts from previous development. Whilst there is some validity in these suppositions the study does not in my opinion properly consider the potential for Palaeolithic archaeology at the interface of the natural gravel and brickearth (Langley Silt). The report says that no site-specific geotechnical data is 'currently' available - and yet the application is also supported by a geotechnical assessment which reports survival of Langley Silt in the majority of their test pits. Wherever Langley Silt survives in-situ it has potential to seal and preserve prehistoric land surfaces containing evidence of human remains and/or associated fauna. The London Region has been described in the London archaeological research framework as one of the most important in Europe for the Lower Palaeolithic and the Langley Silts of West London are one of the physiographic zones highlighted.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in Accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative

Written schemes of investigation will need to be prepared and implemented by a suitably qualified

professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a cost effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation. Geotechnical investigations should be used to target archaeological test pits on areas of surviving Langley Silt.

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.

Archaeological test pits should be dug in areas of surviving Langley Silt and the silt and its interface with the gravels sieved for artefacts and animal bone. The deposits should be examined and, where necessary, sampled and analysed by a geoarchaeologist in order to understand the date and circumstances of their deposition. If significant remains are found then stage 2 would require further investigation prior to development.

Case Officer's comments:

The above conditions are recommended to be attached to any grant of planning consent.

MINISTRY OF DEFENCE - DEFENCE INFRASTRUCTURE ORGANISATION

The application site is positioned within the Hayes area, and lies approximately 6.58km to the north of the centre of the main runway at RAF Northolt. The site occupies aerodrome height and birdstrike statutory safeguarding zones surrounding the aerodrome.

Birdstrike

The MOD has no concerns

Aerodrome heights

The proposed development site occupies the statutory height safeguarding zone that ensure air traffic approaches and the line of sight of navigational aids and transmitters / receivers are not impeded. The airspace above and around the aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre.

The proposed development site occupies the statutory aerodrome height safeguarding zone which protects the Conical surface surrounding RAF Northolt; this is in place to ensure air traffic

approaches, take offs and manoeuvres are not impeded. Following a review of the proposal, I can confirm that we have no aerodrome height safeguarding concerns with this development. However, the MOD recognises that cranes may be used during the construction of tall buildings at this site, if this development does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures. We would request that a condition such as the one below is included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting). The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.

Case Officer's comments:

A Construction Management Plan condition and a condition relating to the use of Cranes are recommended to be attached to any grant of planning consent.

METROPOLITAN POLICE

I have met with the applicant and explained what is reviewed the site and explained what is required for Secure By Design (SBD), which this site can achieve. I do not wish to object. I request a condition is attached that the site achieves SBD accreditation. If justification for this request is required please contact me again for.

Case Officer's comments:

The above condition is recommended to be attached to any grant of planning consent.

TRANSPORT FOR LONDON (TfL)

1. Site Access - Since you have confirmed that the proposed emergency vehicle and non motorised user access located on the southern perimeter of the site at Chalfont Road will be open 24/7, it is therefore expected that this access arrangement will be secured by appropriate planning condition/ s106 planning obligation with Hillingdon Council.

2. Trip Generation - It is considered that your estimated person trip rate of 0.603 (201 trips) for AM and 0.721 (240 trips) for PM peaks per dwelling are reasonable, despite only one TRICS site is consulted. However the mode share figure shown in page 2 of the response is very different from the figure shown in Table 6.7 of the submitted TA, therefore further clarification is needed.

3. Bus Contribution - TfL confirms that the cost of providing a pair of bus stops on Pump Lane would be of £25K, this should be secured by S106 agreement. In addition, TfL will confirm if there would be need to mitigate bus service capacity until the discrepancies on mode share discussed above has been clarified.

4. Car Parking - As per mentioned in the Initial response, the application site is situated in a good public transport access (PTAL 4) area, therefore parking level must not exceed 0.5 spacer per unit as a maximum. It should be noted that the local junctions and section of A312 and Bulls Bridge Roundabout nearby are heavily congested, therefore TfL insists that parking provision must be no higher than the Draft London maximum level, to be in line with policy T6.1 'residential parking' of the

Draft London Plan. In terms of Electric vehicle charging points provision, the applicant should best endeavour to maximise passive EVCP provision.

5. Impact to highway network - The correction to Table 7.3 and 7.4 is noted. While TfL supports the general approach that mitigation strategy should be focus on pedestrian, cycle and healthy street type improvement, the overall result of local junction assessment is showing that there is very little spare capacity and there is a great need to restrain vehicular traffic generation to minimise the increase of impact to the local and TLRN- namely the Bulls Bridge Roundabout, which is already operated beyond its capacity.

6. Impact on Strategic Roads - as described in TfL's previous comments, the Hayes DIFS supports contributions towards Bulls Bridge/A312 by all developments in the Hayes Opportunity Area, due to their combined cumulative impact on its operations. Indeed this development is explicitly named within that document as one of those which will need to contribute. This document has been publically available since May 2017. Furthermore the highway modelling which has been submitted does not demonstrate there will be no impact on the junction, as it does not include an assessment on the re-distribution effect which will be caused by the development vehicle trips in this highly saturated area. As stated in previous correspondence, in order to demonstrate this TfL would require the use of a strategic model. This exercise will be needed prior to any Stage 2 determination, under the London Plan requirement 6.2. Please be aware that this process has a timescale of around 8-12 months, costing the applicant in the region of £400k depending on specification.

7. If the applicant is acceptant of the conclusion within the Hayes DIFS that all Hayes Opportunity Area developments should contribute to the cumulative impact at Bulls Bridge roundabout, TfL would welcome a contribution of towards their A312 Healthy Streets scheme to encourage motorised junction users to mode shift toward sustainable modes, enabling local residents access to the wider area including the green space at Cranford Park, and improving air quality within this air quality hotspot.

8. Travel Plan - Comments is noted and Travel Plan, DSP and CLP are expected to be secured by s106/ conditions with the Council.

Case Officer's comments:

A condition requiring details of emergency vehicle site access arrangements is recommended to be attached to any grant of planning consent, along with servicing and construction management plan conditions. A travel plan with £20,000 bond plus further contributions for enhancements to the locality will be secured through a s106 legal agreement should the application be approved. The level of parking is considered acceptable in this location as set out within this report.

HAYES TOWN PARTNERSHIP

These comments are submitted by the Hayes Town Partnership in response to the proposals from Fairview New Homes Ltd to redevelop the Chailey Industrial Estate in Pump Lane Hayes.

The Partnership is a multi-agency body set up by Hillingdon Council to help regenerate the area. Besides the Council our members include Hillingdon Police, Hayes Town Business Forum, Hillingdon Chamber of Commerce, Uxbridge College (Hayes Campus) and Brunel University plus major employers and developers. This response is from the Partnership as a whole and does not purport to represent the corporate view of the Council or any of the other partners who may make their own submissions.

Redevelopment for housing

The release of the site from industrial land for redevelopment for housing is in line with the proposals in the Hillingdon Local Plan Part 2 and is accepted by the Partnership.

The proposed number of units and the height of the residential blocks appear to be in line with current policies and are reasonable.

An allocation of 35% of units for affordable housing is welcomed.

Non-housing element of development

The proposed use of space on the Pump Lane frontage for commercial activities is noted but there are the following concerns about this proposal:

- The desire for flexibility is appreciated but it is considered that more work needs to be done to establish if there is likely to be sufficient demand for small office units at what is a fairly long distance from the new Hayes & Harlington Station and the service that will be available on the Elizabeth Line.
- The provision of only 3 car parking spaces limits the number of jobs that might be generated from any meaningful employment use.
- The proposed layout of this part of the development has no facility for deliveries.
- The current single level design does not offer flexible use of the space and therefore limits potential occupiers still further.

As well as the need to expand its case for commercial use the Partnership requests the developers to examine the following alternative non-housing elements:

- Re-provision of the gymnasium facilities similar to those currently provided on the site by Olympian Fitness. While it is true to say that there is already other gym provision in the Town Centre or planned it is considered that there is likely to be a continuing market for the sort of facilities that exist at the moment.
- Another possibility is the provision of childcare facilities. A check with Hillingdon's Children & Young People's Services confirms that it is working on the assumption that there is going to be a significant increase in the resident population of Hayes Town Centre over the next 5 to 6 years. The current childcare provision is static and it is therefore expected that there will be a clear shortfall of places. This development could assist in meeting that need both for the residents who will be occupying the new flats and the wider community. However, if this suggestion is pursued it will be necessary to provide some outdoor space and this is not included in the present design.

Vehicular access

It is noted that there is only one vehicular access into the development and it is queried whether this is sufficient in terms of fire safety. Should there be a secondary access for use in emergencies?

Cycle parking provision

The provision of cycle parking spaces will no doubt be in accordance with current standards but the Partnership is concerned that there has to date been inadequate attention given to the creation of a joined-up cycle network for Hayes Town. It is suggested that the developers should contribute funds towards the cost of engaging a consultant to take on this task.

Landscaping and amenity space

The landscaping proposals and the provision of a dedicated children's play space are welcomed. The opening of an access road from Pump Lane into Minet Country Park will provide a significant green space within a reasonable distance of the development. However it is considered that the towpath of the Grand Union Canal also provides a nearby opportunity for walking as well as a cycling route and that the developers should contribute to the costs of bringing this up to 'Quietway' standards.

Impact on local infrastructure

A major concern of the Partnership is that granting approval to another housing development in Hayes will add to the pressure on local infrastructure, particularly in relation to health services,

school places, youth provision and other facilities. In the absence of an overall plan for Hayes Town Centre it is important that the contribution from the developers by means of the Community Infrastructure Levy is used to meet the specific needs generated by this development in the event that planning permission is granted.

Case Officer comments:

Emergency vehicle access is proposed off Chalfont Lane. Contributions toward improvements to the local cycle network will be secured through a s106 legal agreement should the application be approved. The proposed commercial units are flexible and could accommodate the uses suggested e.g. gym and children's centre.

GREATER LONDON AUTHORITY (GLA) STAGE 1 RESPONSE (Summary - Conclusions)

London Plan and draft London Plan policies on principle of development, industrial land, housing, urban design, energy and transport are relevant to this application. The application does not currently comply with the London Plan and draft London Plan, however, the following changes might lead to the application becoming compliant:

Principle of development:

The site is currently designated as Strategic Industrial Land; however, given that the site is allocated for release through a plan-led approach, the principle of the release of this industrial land for residential uses is acceptable, in accordance with draft London Plan Policy E5, and the residential led-development of the site is supported.

Affordable housing:

It is proposed to provide 35% of the residential units as affordable housing, comprising 27% affordable rent and 73% intermediate. The 50% Fast Track threshold for industrial land has not been met and the tenure split falls short of meeting the draft London Plan and Local Plan targets. The applicant's FVA will be interrogated by GLA officers to confirm the maximum level of affordable housing that the scheme can support. Early and late stage reviews will be required. Further information is also required on the affordable rented product and on the shared ownership units

Urban design:

With regard to the architecture, further refinement and differentiation in the character areas is required to ensure that the proposals represent the best design quality. Further information and justification is also required on: the number of units per core; the number of north facing units; the layout of the southern block; and views of the scheme locally.

Energy:

Whilst the applicant has broadly followed the energy hierarchy, the Combined Heat and Power strategy does not comply with GLA Energy Planning Guidance and must be revisited. Once a revised strategy has been developed, the applicant must rerun the carbon savings calculations for each element of the hierarchy, as well as for the overall development.

Transport:

The proposed car parking is in excess of the draft London Plan and London Plan and should be reduced. Further information is also required on the following: cycle parking; trip generation data; walking and cycling improvements. Financial contributions towards enhancing existing bus services and towards upgrades as part of the Housing Zone are required.

Case Officer's comments:

The GLA response is noted in terms of the acceptability of the principle of development. The level of affordable housing is consistent with Council policy and has been supported by an independently reviewed Financial Viability Appraisal. The Council's Urban Designer has reviewed the proposals

and raised no objections. The Council's Sustainability Officers has reviewed the proposals and raised no objections subject to an appropriate carbon off-set contribution which the applicant has agreed to. The proposed level of car parking is deemed acceptable subject to the contributions set out within this report.

Internal Consultees

URBAN DESIGN

The applicant has worked positively with Officers throughout the pre-app process. And has undertaken a number of revisions to produce a scheme that is acceptable in design terms. This approach will balance the quantity proposed to optimise the site for redevelopment, with the quality required to create a successful residential-led development that will contribute to the positive growth of Hayes.

The principle of development is supported, as the former industrial/ employment site has been identified for release (SA22) from its current land-use designation in the emerging Local Plan Part 2 (LLP2) policy. Therefore, Officers support the principle of a residential-led mixed use development proposal for a location that is outside of the town centre, albeit located on the edge of the boundary and a salient position on Pump Lane, within the Hayes Housing Zone (emerging Hayes Opportunity Area).

The design has evolved over the course of a number of pre-app meetings and internal design reviews, which has resulted in the following objectives, benefits and outcomes...

1) Introduce a setback from Pump Lane that will be circa 10m. This setback has many benefits that includes a) the increased provision of public realm, considering the deficit identified in the Hayes DIFS, b) allowing for the future provision of highways intervention and mitigation measures to support the increased growth of Hayes in the Pump Lane area that includes cycling and potential buses in the longer term, c) setback that is commensurate to the scale of development proposed on the site to mitigate the impact of increased building heights and massing, for example, against the prevailing existing context to the north, d) reduce the air quality impact on residential dwellings and associated amenity space, if set away from the negative AQ areas along Pump Lane.

2) Provide a central 'green' public open space and a range of supporting 'green' landscaped curtilage spaces within the development site that are meaningfully (usable) sized to address a) the increased provision of public open space, considering the deficit identified in the Hayes DIFS, b) supplement the required level of amenity space provision for residents, c) introduce SUDs for surface water drainage that is integrated into the landscape strategy, d) mitigate air quality concerns with increase planting, e) increase biodiversity to encourage new and support existing habitats, f) mitigate (soften) the impact of the proposed development, g) contribute to the reduction of the potential cumulative 'urban heat island' effect of new development in Hayes, h) create a range of landscaped spaces that vary in size, use and levels of privacy inc. play areas that are evenly distributed across the development site, responding to the developments requirements and residents needs - this will add richness and character to foster placemaking.

3) Introduce new employment uses to, a) mitigate losses of the existing site land use, b) promote active frontages along Pump Lane and generally activate the development outside of residential usage hours, c) support emerging wider employment strategies for Hayes that is responding to new employment trends.

4) Create a variety of scale and form within the development to, a) respond to the varying edge conditions, b) optimise site to balance quality and quantity, c) reduced the impact of the development on neighbouring properties, d) positively contribute to the townscape setting in Hayes.

5) Introduce a development podium typology that integrates a) parking within a podium deck to

reduce the impact of on-street parking, b) create 'front doors onto street' to activate the public realm, c) introduce family duplex and/or triplex dwellings at the ground floor with a 'back garden' onto the first floor podium deck, d) create an adequately sized semi-private podium deck amenity space for residents with planting etc.

6) Introduce a home zone, a) create a residential focused public realm and 'livable streets', b) reduced on-street parking to increase the quantum of public open space, areas of play, landscaping and permeable ground for SUDs.

7) Allow adequate setbacks from neighbouring sites a) not to constrain emerging and identified development opportunities i.e Matalan, b) to mitigate the impact of active employment and industrial uses on the proposed residential areas of the development, c) to ensure the sustainability of the existing employment uses that are not impacted by new residential development, c) create an improved interface that reduces the impact on existing residential houses and their curtilage space.

8) Not to consider the site in isolation, therefore a wider 'connectivity' strategy has been developed to ensure the site's positive integration with a) neighbouring sites and land uses, b) town centre core, c) canal and 'Quietway', d) Crossrail station.

9) Maintain architectural design quality throughout the development to a) create a bespoke development that is contextual, articulate in form and legible (plus varied) in use - fostering the principles of placemaking, b) breakdown the mass and form of the development to reduce its impact, c) introduce high quality materials and robust detailing, d) create an interesting and varied roofscape.

The applicant has successfully met these objectives through design development and positive consultation with Officers. The scale of the development ranges from six to eight storeys, and dropping down to five and four storeys, in response to the varying edge conditions of the site. A taller eleven storey feature building is located towards the centre of the site that has been oriented and architecturally treated to reduce its immediate impact, whilst making a positive contribution to the emerging Hayes setting. The overall scale of development has been rigorously tested through a comprehensive TVIA, with Officers agreeing the various and numerous points that views should be taken from. For these reasons, the scale and form of the development is acceptable in townscape terms. And the residential-led mixed use development will make a positive addition to Hayes in regeneration terms, helping to raise the bar of future development. It is important that the scheme is not 'value engineered' post planning. Therefore a standard condition on materials is required and Officers will not accept the use of render that is not considered a robust material for this location or anywhere in the proposed development site.

The proposed scheme in it's current form is supported and recommended for approval on Design and Conservation grounds.

POLICY Development Plan

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Saved UDP Policies (2012)
- The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Local Plan: Part 2

The Local Plan Part 2 Draft Proposed Submission Version (2015) was submitted to the Secretary of State on 18 May 2018. This comprises a Development Management Policies document, a Site Allocations and Designations document and associated policies maps. This will replace the current Local Plan: Part 2 - Saved UDP Policies (2012) once adopted.

The document was submitted alongside Statements of Proposed Main and Minor Modifications (SOPM) which outline the proposed changes to submission version (2015) that are being considered as part of the examination process.

Submission to the Secretary of State on 18th May 2018 represented the start of the Examination in Public (EiP). The public examination hearings concluded on the 9 August 2018. The Inspector has submitted a Post Hearing Advice Note outlining the need to undertake a final consultation on the Main Modifications only. The Council has responded to this note outlining that its preferred dates for doing so would be 27th March 2019 to 8th May 2019. All consultation responses will be provided to the Inspector for review, before the Inspector's Final Report is published to conclude the EiP process.

Paragraph 48 of the NPPF (2019) outlines that local planning authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

On the basis that the Council is awaiting the final Inspector's Report on the emerging Local Plan: Part 2, the document is considered to be in the latter stages of the preparation process. The degree to which weight may be attached to each policy is therefore based on the extent to which there is an unresolved objection being determined through the public examination process and the degree of consistency to the relevant policies in the NPPF (2019).

Designations

In the adopted Local Plan: Part 2 - Saved UDP Policies (2012), the site is located within an Industrial and Business Area (IBA).

In the emerging Local Plan: Part 2 - Site Allocations (2015), the site comprises all of SA 22. This allocation is for the redevelopment of the site for residential use, subject to a series of development principles. However, within the SOPM (2018), it is proposed that the adjacent Matalan site is also allocated for redevelopment and thus Chailey Industrial Site is Site A of SA22.

Comprehensive Development

Policy BE14 of the Local Plan: Part 2 - Saved UDP Policies (2012) outlines that permission will not be granted for the development of sites in isolation if the design fails to safeguard the satisfactory redevelopment of adjoining sites which have development potential. Within the SOPM (2018), the adjacent Matalan Site has been identified for redevelopment as Part B of SA 22.

The proposal incorporates an 11m setback from the neighbouring Matalan Site to the East, in order to assist in safeguarding the redevelopment of this site. Furthermore, in the interim period where the neighbouring site will continue to operate in its existing form, this setback will minimise any potential

friction arising between the new residential units and existing commercial use. The proposal also incorporates part of the sites' non-residential commercial use on the North Eastern ground floor, in order to ensure a more complementary use opposite the entrance to the Matalan.

The proposal successfully demonstrates how the redevelopment of Site B could be undertaken cohesively in line with this scheme, particularly in terms of demonstrating how new connectivity from East to West has been incorporated. Furthermore, onsite amenity space provision on both the 'green boulevard' and the eastern boundary of the site would create new green infrastructure in an area with a notable shortage (DIFS, 2017). In particular, the proposed 'woodland area' on the eastern boundary provides an opportunity for integration with future amenity space from Site B, in order to create a critical mass of publicly accessible open space.

The redevelopment of this site also borders Strategic Industrial Land (SIL) to the south east which is occupied by a number of existing businesses. It is therefore important that new development does not compromise the integrity or effectiveness of this SIL in accommodating existing or future business, in line with Policy 2.17 of the London Plan (2016). It is considered that the development proposal avoids doing so by incorporating sufficient setbacks and introducing significant planting to create a green buffer between potentially incompatible uses.

The scheme also includes new connections North to South, improving the connectivity between Pump Lane and Silverdale road, as well as to the Grand Union Canal and Town Centre. The proposal also includes a setback from Pump Lane to allow for the introduction of potential public transport improvements and is therefore deemed to be in conformity with the latest requirements of emerging Policy SA 22.

Principle of mixed use development:

In the adopted Local Plan: Part 2 - Saved UDP Policies (2012), the site is located within an Industrial and Business Area (IBA). However, in the emerging Local Plan: Part 2 - Site Allocations (2015), the site is located as SA 22 for redevelopment as a new residential scheme.

The release of SA 22 from its designation as an IBA is justified within the employment land studies that form part of the Local Plan evidence base.

The allocation is deemed to be consistent with the wider principles of the Hayes Housing Zone and the introduction of a new Crossrail Station at Hayes & Harlington Station. Furthermore, it is also consistent with the implementation of Policy H1 of the Local Plan: Part 1 - Strategic Policies (2012), particularly in that it:

- Ensures development makes the most efficient use of brownfield land;
- Promotes high quality mixed use development; and
- Represents the release of sites in non-residential use, subject to policies in the Development Plan.

Emerging Policy SA 22 also notes that the inclusion of community infrastructure and small scale commercial uses to support the residential units will be suitable. As such, the applicant is proposing the inclusion of 710 sq.m of flexible ground floor commercial floorspace (A1, A2, A3, B1, D1 or D2). Noting the support within emerging Policy SA 22 and the sites Edge of Centre location, the quantity of commercial floorspace is deemed appropriate and not of a scale that would detract from the vitality of the Town Centre.

The proposed redevelopment will result in the displacement of the Olympian Fitness gym which currently operates on the site and as such the proposal represents the loss of an existing community facility. However, the inclusion of new D1 and D2 floorspace in the proposal means there is the opportunity for a new gym or alternative community infrastructure to operate on the site in the future depending on demand.

Residential Mix

Policies H4 and H5 of the Local Plan: Part 2 - Saved UDP Policies (2012) relate to the mix of housing to be provided on new schemes. Policy H4 notes that within town centres, predominantly one and two bedroom developments will be preferable. Policy H5 however also notes that the council will encourage new homes for large families where required, including through the provision of larger dwellings by the private sector in new developments.

The latest evidence of local housing need comes from the Strategic Housing Market Assessment (2016) which indicates a substantial borough-wide requirement for larger private market units, particularly 3 bedroom properties. In regards to affordable housing specifically, the need is for 2 and 3 bedroom properties.

The scheme is proposing a mix of unit sizes at the following proportions:

1 bedroom: 117 (35.1%)
2 bedroom: 161 (48.3%)
3 bedroom: 55 (16.5%)

Whilst there is a focus on one and two bedroom units in the scheme, 16.5% of the site is included for family accommodation in line with Policy H5, which is a higher proportion than on other recently approved large applications within Hayes.

Noting the support for one and two bedroom units near town centres within Policy H4 and the close proximity of the site to Hayes Town Centre and the new Crossrail station, the residential mix is deemed consistent with the adopted Development Plan.

Affordable Housing

The applicant is not proposing 35% affordable homes by habitable rooms in line with the tenure mix stated within Policy H2 of the Local Plan Part 1 and emerging Policy DMH7 of the Local Plan Part 2 and as such has submitted a Financial Viability Appraisal (FVA) to justify why it is not viable to do so.

This FVA is being independently assessed by the Council's own consultants. If viability is demonstrated to be an issue, the tenure mix should be the starting point for negotiations where this could support a greater number of affordable homes. Final options, showing different affordable housing levels with different tenures, should be provided to Housing Officers for final determination. One of these options should include the tenure mix outlined within the Council's Development Plan. The use of London Living Rent as part of the tenure mix for a second option is considered appropriate.

Case Officer's comments:

The FVA has now been independently assessed by the Council's own consultants and viability demonstrated to be an issue. As such the proposed affordable housing provision is deemed acceptable. A large amount of additional D1 gym space has recently been allowed at a retail park in Hayes.

WASTE MANAGEMENT OFFICER

The application proposes that refuse collections for Building A will be made directly from Pump Lane. There is an existing 2 metre wide, width restriction present at this location on Pump Lane which would prevent the vehicle from continuing in a forwards motion. Should the vehicle stop at this location, it would cause a build up of traffic which would be unable to pass due to the width restriction. It is also considered unsafe for the vehicle to reverse along Pump Lane which would be necessary in order for the vehicle to continue. The proposed bin store is 13 metres from the proposed stopping point. The layout as proposed is not deemed acceptable.

Objection: based on BS 5906:2005 clause 10 and clause 11. Roads should have a minimum width of 5m and be arranged so that collecting vehicles can continue mainly in a forward direction, and the collector should not normally be required to manoeuvre four wheeled waste storage containers from the storage points to collecting vehicles for a distance of more than 10 m.

If the application could resolve the above objection I would recommend the following conditions:

There is currently no refuse storage area clearly allocated for Commercial Unit 03. It would not be acceptable for this unit to have shared use with the residential storage area. Proposed condition: 'An adequate provision for waste and recycling storage must be provided for Commercial Unit 03. If this is sited externally to the unit, measures should be taken to secure the container(s) which should be stored away from the windows and doors of any dwellings. If a storage area is located within the unit, the design should be such that the container(s) can be removed directly to the outside without passing through any part of the building except by way of passage. An internal bin storage area should have appropriate passive ventilators to allow air flow and stop the build up of unpleasant odours. The ventilation needs to be fly and vermin proofed and near to either the roof or floor, but away from the windows of any dwellings.'

The refuse stores located in blocks E, F, G & H are located further than 10 metres from the closest vehicle stopping point. Proposed condition:

'Alternative collection points must be indicated on the plans and approved. Personnel must be provided to relocate the waste and recycling containers on the allocated collection day. The pathway from refuse stores and collection points must be a minimum of 2 metres wide, have a smooth surface and be free from steps or kerbs. Suitable dropped kerbs must be installed on the existing highway where the vehicle is to carry out collections from Pump Lane. It is not suitable for waste and recycling containers to be pulled across allocated parking bays.'

Proposed condition:

For the safety of the collection crews, a suitable latch or clasp must be fitted to refuse store doors where collections will take place directly from the store to allow the doors to be safely held open whilst collections are carried out.'

Case Officer's comments:

An amended ground floor layout has been proposed by the applicant (plan reference T20P00 Rev 1B) which has been reviewed by the Council's Waste Strategy Officer and, subject to a Waste Management Strategy condition, they have confirmed that they no longer object to the application. The proposed condition is recommended to be attached to any grant of planning consent.

LANDSCAPE ARCHITECT

The site is an industrial estate situated on the south side of Pump Lane, opposite the exit of the public car park. The west and (part of the) southern boundaries back on to residential properties in Little Road and Chalfont Road, with the south-east corner backing onto the Silverdale Industrial Estate. The Matalan retail outlet and car park lies to the east. There are no TPO's or Conservation Area designations affecting the site directly, although TPO 328 protects a group of Lombardy poplars on the Matalan frontage.

Comment

This proposal has been the subject of pre-application advice regarding the layout and landscape masterplan.

Existing trees: A tree survey, dated January 2018, by Keen, has been submitted. The survey confirms that the few trees on the site are of low quality, however, a total of 18 trees have been identified and assessed which are on, or close to, the site. There are no 'A' grade trees. Three (off-site) trees are 'B' grade; T2, T9 and T15 - whose condition and value indicates that they should be

retained as part of any new development. The other 15 trees are 'C' and 'U' grade trees which do not pose a constraint on development. The report contains a Tree Constraints Plan but does not include an Arb Impact Assessment (AIA) or Tree Protection Measures. While the AIA is required for the sake of clarity, it is noted that none of the off-site 'B' grade trees appear to be at direct (or indirect) risk from the construction- related activities.

D&AS: Section 8.0 Landscape Design The D&AS provides a comprehensive and precedent images to support the landscape masterplan and convey the intended landscape character. The landscape plan features five key landscape zones; Pump Lane frontage, Chalfont Square, Chalfont Road Home Zone, Woodland area and Podium Level Gardens (on the first floor). The masterplan has been designed to provide well-landscaped boundaries, attractive through routes for pedestrians, lush swathes of planting, a semi-natural linear park. While a significant amount of planting is proposed at ground level (more sustainable), the first floor podium level garden extends over a substantial area and will be large enough to create a variety of attractive and accessible spaces for the occupants of the flats. A range of indicative surface treatments is illustrated under the hard landscape strategy, using permeable paving materials. Boundaries will be defined by (powder-coated) steel railings specified at 1.1metres and 1.8 metres in height. The soft landscape strategy has considered the required heights and form of planting which has guided the planting palette. 'Structure' planting includes the use of single and multi-stem trees and hedges, planted in a range of sizes. 60 small / young trees will be planted on the podium level and well over 100 trees (mixed sizes) will be planted throughout the site at ground level. Play spaces have been incorporated within the masterplan to accommodate doorstep play (for under 5's), local playable space (< 11 years), neighbourhood playable (<11+ years) and youth space (12 +). Trees have been selected and green walls incorporated into the scheme with a view to filtering airborne pollutants and improving local air quality. Subject to detail, the scheme will provide a net gain in green infrastructure and biodiversity.

Recommendation

No objection subject to conditions RES9 (parts 1,2,3,4,5 and 6).

Case Officer's comments:

The proposed condition is recommended to be attached to any grant of planning consent.

ACCESS OFFICER

This proposal appears to meet the technical considerations to satisfy accessible housing standards, namely M4(2) and M4(3), as required by London Plan policy 3.8 (c) and (d).

However, detail is lacking on the following design elements to meet London Plan policy 3.1 (Ensuring Equal Life Chances), 3.5 (Quality and Design of Housing) and 7.2 (Inclusive Environment):

1. A detailed plan should be submitted to demonstrate how the proposed Home Zone:
 - a. successfully alerts motorists, cyclists and pedestrians to the shared surface environment;
 - b. achieves clear wayfinding for blind and partially sighted people; a design that minimises the risk of blind people straying into the path of moving vehicles;
 - c. rationalises use of bollards and similar obstacles;
 - d. defines car spaces to ensure vehicles are parked only in designated places;
 - e. introduces measures that force slow vehicle movement;
 - f. would be legible to aid navigation; it should be possible to easily differentiate one area of the development from another.

2. A drop-off point for door-to-door service providers, to include large Dial-A-Ride vehicles, should be provided

3. 10% of Affordable Housing units would be required to satisfy the design standards for an M4(3) Wheelchair Accessible unit.

4. A floor plan at no less than 1:100 should be submitted for each of the different M4(3) units. All details, to include transfer zones, wheelchair storage area, and other spatial requirements within bedrooms, bathrooms, living and dining areas, should be shown on a separate plan for every different unit type.

5. All remaining units must be designed to the standards for Category 2 M4(2) Accessible and Adaptable dwellings, as set out in Approved Document M 2015.

6. The affordable units should be suitable for 'day one occupation' by a wheelchair user. These units should be designed and fitted as per the prescribed standards for a Wheelchair Accessible M4(3) unit, as set out in ADM 2015.

7. Details of the materials palette, with particular attention given to the paver types to be installed in accordance with the tolerances set out in BS8300:2018.

8. No details appear to have been submitted on play equipment to be installed for disabled children, including those with sensory or complex multiple disabilities. Provisions could include outdoor sound tubes, colour and lighting canopies, and other play equipment that could stimulate the olfactory senses. Inclusive play is a key requirement of any new residential development.

Conclusion: it would be acceptable to secure the above provisions through appropriately worded planning conditions.

Case Officer's comments:

Conditions relating to details of the Homezone and M4(2)/M4(3) dwellings are recommended to be attached to any grant of planning consent. The proposed landscaping condition also requires details of hard surfaces and play equipment.

HIGHWAYS ENGINEER

The application site is located along Pump Lane which connects to Hayes Town westbound and the A312 (The Parkway) eastbound. Pump Lane borders the north of the site itself with local residential roads forming the western boundary and commercial/industrial premises located to the east/south.

The site is currently served by three all mode points of access which are located along the Pump Lane site frontage. Whilst the site at present is served by minor access roads which include Little Road to the west of the site and Chalfont Road/Silverdale Road to the south, these access points are currently closed off.

There site currently comprises mixed use commercial units which are made up of 1 and 2 storey warehouse industrial buildings. Commercial vehicles frequent the site on a regular basis with use of all three points of access.

You will be aware that this application seeks the demolition of the existing commercial buildings to accommodate the provision of 333 residential units and 3 commercial units measuring approximately 710sqm along the site frontage.

Having reviewed the PTAL rating for the proposed development using the Transport for London WebCAT service, it is indicated that the site has a PTAL rating of 3 which on a scale of 1-6b is considered to be moderate. It is noted however that the site is within a relatively short walking distance to the Hayes Town Centre which provides a plethora of sustainable transport modes. This is reflected with a high PTAL rating of 4 and 5.

Parking and Access Provision

The schedule of the proposed residential units comprises of the following:

Studio x 29
1-bedroom x 88
2-bedroom x 161
3-bedroom x 55
Total 333

Policy AM14 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that all development is in accordance with the Councils adopted Car Parking Standards.

During the pre-application stages, it was noted that the Councils car parking standards are based on a maximum approach and that some degree of flexibility would be provided given the sites relative sustainable location in relation to the Hayes Town Centre. The current scheme provides a lesser amount of parking at 62% (0.62 per unit).

The proposals will provide 207 parking spaces within the site curtilage which will be in the form of surface level and undercroft parking. These spaces will be accessed by residential occupants only.

In accordance with currently adopted saved Unitary Development Plan, a recommended maximum parking provision of 441 is to be provided. This equates to a parking ratio of 1 space per studio/1-bed unit and 1.5 spaces per 2/3-bed unit. It is apparent from the submitted information that the level of provision proposed not only falls short of the UDP standard but also the emerging DMT6 policy and parking standard for residential developments where a higher demand of parking is required.

However, the site does in fact exhibit a moderate PTAL rating albeit within a short walking distance of Hayes Town Centre where a rating of 4/5 is indicated which is reflected by the number of available services and Public Transport Links in the form of Bus stops and access to Hayes and Harlington railway station.

It should also be noted that with the introduction of Crossrail which is to commence later in 2019 and the introduction of an extended (H32) bus service along Pump Lane, the area will undoubtedly demonstrate improved provisions for sustainable modes of travel.

If the linkages between the development and Hayes town centre are convenient and attractive to use, then future residents of the development will be less reliant on the private car to meet their daily travel needs. A developer's contribution is therefore required to ensure that connectivity between the site and the town centre can be improved.

It is therefore considered that subject to an appropriate contribution (see further details below) the level of parking proposed is sufficient in accommodating the residential component of the proposals.

Disabled Parking

To accord with both the currently adopted UDP standard and the emerging Local Plan: Part 2 DMT 6 policy, it is required that 10% of parking provision be allocated to blue badge holders.

Under the proposed level of parking for the residential units it is required that 21 spaces be allocated to disabled users. Whilst it is proposed that 34 spaces be allocated thus representing an overprovision of 13 spaces, this is deemed acceptable.

Electrical Vehicle Charging Points

Provision for electrical vehicle charging points has been provided in excess of the London Plan standards which require 20% active spaces and a further 20% as passive. The submissions propose that 20% as active provision and 54% as passive provision as a measure of mitigation. This represents 41 'active' spaces and 112 'passive' spaces.

Cycle Parking

With regard to cycle parking, it is proposed that a total of 549 spaces be provided across the development. Long stay parking will be located within covered storage with short stay cycle parking being provided at a ratio of 1 space per 40 units. Whilst this is in accordance with the London Plan standards, this is considered an overprovision when compared to the 388 spaces required as per the UDP standards.

Furthermore, when considering that the majority of large developments within the Hillingdon Borough do not fully make use of cycle parking facilities which remain unoccupied mainly as a result of the Outer London status, it is considered that the available areas could be put to better use i.e. amenity space etc. On this basis, the space requirement as set out in the UDP standard is considered to be suitable and should be applied. I trust this can be secured by way of condition.

Parking Provision - Commercial Units

The submissions seek flexible commercial floor space (Use Classes, A1, A2, A3, B1 or D1). Whilst vague, I have based this part of the assessment on a worst case scenario. When considering the quantum of development and in accordance with the Saved UDP standards, it is required that 14 parking spaces be provided. It is apparent from the submitted information that only 3 spaces are proposed for staff with no parking being provided for visitors on site.

Whilst this represents a shortfall in parking, given the sites sustainable location and that any potential commercial parking taking place will be controlled via a CPMP (Car Parking Management Plan), I find this level of provision sufficient.

Car Parking Management Plan

As part of the submitted car parking management plan framework, it is proposed that a site management team be appointed to oversee and implement the established measures. This will prevent inappropriate/informal parking taking place by residents and users of the site. The submitted CPMP is accepted and a condition should be imposed finalising the plan.

Access Provision

The proposed development will see the stopping up of all existing access points currently serving the application site along Pump Lane. These are to be replaced by a primary all mode access along the north-western edge of the site boundary (with Pump Lane). The proposed access will provide a 6.0 metre wide carriageway width with footway in excess of 2.0 metres either side

An emergency site access is also to be provided south of the site in the position of the existing access point and will be used solely for pedestrian, cycling and emergency access via Chalfont road. It should be noted that whilst this access is to remain open 24/7, collapsible bollards will be implemented in order to allow emergency vehicles access. Residents associated with the site will therefore be unable to gain access to the respective parking areas from this point. This is to be addressed by way of condition.

The eastern most access along Pump Lane will accommodate service vehicles accessing the plant room which is to take place once every 3-4 months. It is mentioned that the type of vehicles carrying out this service will comprise of small vans only.

A non-motorised user access is also to be located towards the south eastern boundary of the site which will be accessed off Silverdale Road.

In summary, the proposals should be subject to detailed designs. Any improvements/stopping up of access points and off-site highway works should be secured via a section 278 agreement and will be upheld by the developer.

Service and Delivery Arrangements

As part of the proposals, swept path analysis drawings have been provided demonstrating associated vehicles accessing and exiting the site in forward gear. This arrangement would however require associated vehicles to undertake 3 point turns within the site curtilage.

Concerns are however raised with associated service/delivery vehicles pulling into the main access point off Pump Lane whilst providing sufficient space for vehicles to exit the site out onto Pump Lane. This is mainly due to the proposed pinch point at the priority junction and servicing layby which should be reviewed prior to any planning consent being granted.

A draft Service and Delivery plan framework has been submitted as part of the Transport Assessment. The final submission should be provided to the council and is to be dealt with by way of condition.

Trip Generation

Policy AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) considers whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety.

To determine the existing level of trips associated with the commercial site surveys were undertaken at the site access points. It is highlighted that the site currently accommodates 11 units with 2 units remaining as vacant. Nevertheless, it has been established the site currently generates 51 movements during the AM peak and 71 movements during the PM peak periods.

Residential Trips

To determine the proposed level of trips associated with application site, the applicant has carried out an interrogation of the TRICS (Trip rate Information Computer System) database involving the proposed use class with reference to two comparable sites. It has been established that the proposed residential development would generate 80 movements in the AM peak and 70 movements in the PM peak.

Commercial Trips

Trips rates for the commercial element of this scheme have been limited to 710sqm. It is expected that commercial units will serve not only the proposed residential units, but pass by/linked trips. The forecast trip generation for the proposed commercial units has been estimated at 8 movements during the AM peak and 4 movements during the PM peak.

Net Vehicle Trips

When comparing both existing and proposed findings, the net increase in traffic movements is therefore concluded to be 37 movements during the AM peak and 3 movements in the PM peak periods. The net increase during the AM period would average 1 vehicle every two minutes entering/leaving the site. The Highway Authority is satisfied with the trip rates demonstrated within the Transport Assessment.

Operational Assessment

In order to ascertain the operation of the highway network the assessment has included TRL Junctions 9 modeling. Three scenarios have been covered.

- Baseline (current) Conditions
- Baseline (without development) plus TEMPRO growth factor (which include committed developments)
- Baseline (with development) plus TEMPRO growth factor (which include committed developments).

The results show that certain arms at the Pump Lane/Bilton Way roundabout junction are over the desired capacity threshold (0.85) with the RFC value below the theoretical threshold (1.0) in both 'with' and 'without' development scenarios.

The Station Road/Clayton Road roundabout junctions are also over desired capacity (0.85 threshold) and the theoretical threshold (1.0) in the 'without' development scenario. However, the values appear to remain constant during the 'with' development scenario.

Whilst discrepancies were raised with the Pump Lane/Botwell Lane/ Coldharbour Lane table values (tables 7.3 and 7.4), this has been addressed.

Permeability Study

As part of the permeability study of the area, it is considered that scope is available to improve the current linkages between the site and key local destinations. This would further enforce sustainable opportunities in the area.

As a result of the study, the following improvements were established (but not limited to):

- Improvements to pedestrian and cycling facilities. Specifically along both Chalfont Road and Silverdale Road.
- Environmental improvements to the parcel of land which sits outside Skeffington Court, making it safe, attractive and a convenient route for pedestrians and cyclists.
- Improving access to the Grand Union Canal towpath.

The Highway Authority would also see that informal pedestrian crossings are incorporated as part of the improvement works at key access points. Financial contributions towards the improvements are to be secured via a section 106 agreement.

Travel Plan

Whilst a Travel Plan has been submitted and sets out the framework and strategy by which the proposed residential units on site can seek to encourage sustainable modes of travel, a work Place Travel plan is also requested to serve the commercial component of proposals.

Although the proposed measures are accepted, further work will be required to ensure and encourage walking and cycling. Reference to taxi/on demand services and Uber is not considered to warrant sustainable travel modes and should be removed from the Travel Plan.

The above is requested to be addressed via a section 106 agreement.

Construction Management Plan

Prior to the implementation of the works, a full Construction Management Plan is required to be secured under a suitable planning condition due to the site constraints of the local highway network. This should detail the management of construction traffic (including vehicle types, frequency of visits, expected daily time frames, use of an on-site banksman, on-site loading/unloading arrangements and parking of site operative vehicles.

Contributions

Town Centre Connectivity

The Chailey site occupies an edge of town centre location within easy reach of local services and facilities as well as train and bus services and access to the Grand Union Canal Cycle Quietway. If the linkages to between development and Hayes town centre are convenient and attractive to use, then future residents of the development will be less reliant on the private car to meet their daily travel needs. A developer's contribution has already been received to carry out a study of ways in

which the connectivity between the site and the town centre can be improved.

Funding is also sought for investment in the measures identified by the study that better connect the development site with Hayes town centre. With attractive and convenient measures for pedestrians and cyclists in place the Council can be confident that these will be used offering a genuine travel alternatives to the private car. This opportunity to better connect the development with Hayes town centre has been taken into account when assessing the quantum of car parking spaces that need to be provided on site.

However the current linkages to the town centre need to be improved for the Council to be confident that they will be frequently used. The footways along Chalfont Road and Silverdale Road are narrow and uneven and lack provision for disabled people, the street lighting is also in need of upgrade.

Adjacent to Skeffington Court, Silverdale Road is a forecourt area with uneven paving slabs, mature trees, many bollards and neglected planting beds. This area benefits from a pedestrian footpath providing access to Crown Close, however this link is unappealing to user as the built environment is harsh with many hiding places. This could be perceived as presenting a risk to personal safety. By contrast pedestrian facilities at the Crown Close end of the footpath are now attractive and convivial to use having recently been improved as part of the Councils £6m Hayes Town Centre Scheme.

To fully take advantage of the sites location, a developers contribution of £250,000 is sought. This will be used towards the following:-

- The upgrade of pedestrian and cycle facilities along Chalfont Road and Silverdale Road
- A complete transformation of the land outside Skeffington Court. The key objective being to make this an direct, attractive, safe and convenient route for pedestrians and cyclist walking and cycling to the town centre; and
- Improving access to the Grand Union Canal towpath from Silverdale Road and upgrading the towpath to Quietway standard. A contribution is sought to part fund the delivery of the works required to link the development to the town centre thereby reducing future occupier's reliance on the private car and the need for car parking

Bus Service Capacity

A developer's contribution is required to support the introduction and establishment of the new Heathrow Airport to Ruislip via Hayes 278 bus service. As well as Heathrow airport itself, this bus service will provide the occupiers of the residential units with direct public transport access to destinations in the north of the Borough including Hillingdon, Ickenham, West Ruislip and Ruislip. None of these centres are currently accessible using a direct bus service from Hayes. A contribution of £25,000 each year for three years is therefore sought.

Grand Union Canal Quietway

Working with developers, Transport for London and the Canal and Rivers Trust the Council has been improving the towpath along the Grand Union Canal to Quietway standard. This involves laying bitumen macadam to create an even and well drained surface providing cyclists and pedestrians with a safe and convenient off-road link.

Work along the section of canal between Stockley Park and Yiewsley is currently on-site.

A developer contribution is sought to improve the section of canal towpath between Hayes town centre and Stockley Park, this will then provide cyclists and pedestrians with a direct car free route between Hayes and Harlington and West Drayton stations from which Elizabeth Line (Crossrail) train services will start to operate in December 2019. A contribution of £50k is sought toward the implementation of Quietway improvement works along this key section of the Grand Union Canal

towpath.

A312 Healthy Streets

LB Hillingdon working with Transport for London is developing package of works to improve the safety and convenience with which cyclists and pedestrians can cross the A312 Bulls Bridge Roundabout. The ultimate aim is to make the pedestrian and cycle routes across the roundabout places for people characterised by the 10 Transport for London Health Streets indicators. A contribution of £25k is sought towards the implementation of the package of works identified.

Conclusion

Mindful of the above, should you be minded to approve the application, I would request that the above mentioned obligations and conditions be attached.

Case Officer's comments:

The proposed contributions have been agreed by the applicant and would be secured through a s106 legal agreement if the application is consented. The proposed service and delivery and car park management conditions are also recommended to be attached to any approval. The Highways Engineer raised a concern regarding service/delivery vehicles pulling into the main access point off Pump Lane, however an amended layout plan has been submitted and the Council's Highways Engineer has confirmed that subject to a condition regarding the final details of traffic arrangements, they no longer have any concerns with the application. The suggested traffic arrangements condition is therefore also recommended to be attached to any grant of planning consent. The proposals would also be subject to a Road Safety Audit and thus can be examined as part of the detailed design if a safety issue is raised.

AIR QUALITY OFFICER

The development proposal is for 333 residential units and commercial floorspace. The location is within an Air Quality Focus Area as defined by the GLA (Focus Area 85, Hayes Town Botwell Lane/Pump Lane) and included within the Hillingdon Hayes Focus Area. Focus Areas are defined as areas where the air quality limits are exceeded, there is relevant public exposure and actions should be prioritised to achieve significant improvements in air quality.

The applicant correctly identifies the requirements for the planning system to contribute towards the delivery of sustainable development highlighting the requirement for the impacts of new development to be mitigated (NPPF, London Plan, Local Plan).

The assessment

The air quality assessment recently submitted has incorporated clean by design improvements which are regarded as standard for a development, especially in areas of identified poor air quality, these are supported:

- a) the incorporation of low NOx energy sources within the development;
- b) maximising the distance between the building and the road source;
- c) locating sensitive uses such as play areas and amenity space away from the road source;
- d) minimising the number of residential units fronting the road source.

As noted, these are standard design measures aimed at protecting future occupiers, and with the exception of the first item (a), they do not reduce the emissions arising from the development itself. Traffic emissions are the main concern in Hayes and these need to be significantly minimised.

Emissions arising from the development

In Focus areas, such as Hayes, where the limit values are already being exceeded, further mitigation is required. To understand the level of improvements required a NOx damage cost has been applied to the development. The air quality assessment calculates this as £401, 677 which is agreed.

The quantifiable reductions from specific mitigation measures on-site have been agreed, namely full and effective implementation of a targeted Travel Plan and a bespoke air quality positive green infrastructure plan. The mitigation in terms of damage costs reductions has been agreed with the Council and calculated at £95,007.

This leaves a quantified damage cost of £306,670 which requires to be addressed ie efforts should be made to reduce emissions further.

The applicant has applied a methodology that suggests that, as the existing site produces £301, 974 in terms of damage costs from existing use of the site, this change of use should be taken into account as a mitigation measure therefore the remaining damage cost has a final value of £4,696. This approach is not supported by the Council in an area where air quality limits, as demonstrated within the air quality assessment, are already being exceeded and where, as the NPPF states, opportunities should be taken to improve air quality. The Council's transport engineers reinforce that the local road network at key junctions in close proximity to the site are over the desired capacity and that the development does result in a net increase in traffic movements entering and leaving the site.

The transport comments state that the Travel Plan requires further work to ensure and encourage walking and cycling, this is a concern, especially as this has been relied upon as a key mitigation measure in reducing emissions.

In terms of achieving further air quality mitigation, the following schemes are supported as measures which if secured and implemented via a s106 obligation could actively contribute to improving the use of sustainable modes of travel:

- Funding of works required to link the development to the town centre thereby reducing future occupiers reliance on the private car - suggested as £250,000;
- Contribution towards improvements to the canal towpath to provide future cyclists and pedestrians with direct car free route between Hayes and Harlington and West Drayton stations - suggested as £50k
- Implementation of the Healthy Streets approach in Hayes - suggested as £25k

The remainder of the damage costs for air quality (£306,670) is, therefore, incorporated within the measures listed above for traffic management purposes. This is without prejudice to any remaining transport measures to be accounted for.

Case Officer's comments:

The proposed contributions have been agreed by the applicant and would be secured by a s106 legal agreement should the application be approved.

ENVIRONMENTAL PROTECTION UNIT

I have read through the acoustic report and it adequately demonstrates how the predicted noise and vibration levels will be controlled through mitigation measures.

1. External noise from machinery, extract/ventilation ducting, mechanical gates, etc.

Condition:

The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

Reason: To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

2. Anti-vibration mounts and silencing of machinery etc.

Condition:

Prior to use, machinery, plant or equipment, including the extract/ ventilation system and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

The proposal includes commercial floor space and residential dwelling above.

3. To ensure that acceptable noise levels are achieved indoors and a reasonable degree of peaceful enjoyment of gardens and amenity areas the following conditions shall be considered.

Condition:

The noise level in rooms at the development hereby approved shall meet the internal noise standard specified in BS8233:2014 for internal rooms and external amenity areas.

Reason: To ensure that the amenity of the occupiers of the proposed development is not adversely affected by road traffic and other noise in accordance with policy OE5 of the Hillingdon Unitary Development Plan

2. Separation of noise sensitive rooms in neighbouring flats

Condition:

The approved development, shall have an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings, namely [eg. living room and kitchen above bedroom of separate dwelling. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenity of the occupants of surrounding properties in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

Case Officer's comments:

The proposed conditions are recommended to be attached to any grant of planning consent.

SUSTAINABILITY OFFICER

I have no objections to the proposed development subject to:

A condition and S106 contribution in relation to energy

A S106 contribution in relation to open space provision

Observations - Energy

The information submitted broadly demonstrates compliance with the London Plan requirements for a minimum of 35% onsite reduction in CO₂ from a 2013 Building Regulation baseline. However, the development does not achieve the necessary zero carbon standards and consequently requires a S106 offsite contribution as per Policy 5.2E of the London Plan.

The shortfall amounts to 214 tCO₂ as set out on page 2 of the Energy Assessment (Low Energy Consultancy Ltd). This equates to 6420 tCO₂ over the 30 year period defined by the GLA as the period of a carbon intensive grid.

The S106 contribution (@£60/tCO₂) is £385,200

In addition, the following condition is necessary to provide certainty over the type and specifications to be delivered as part of the final designs.

Condition:

Prior to above ground works, full details of the low and zero carbon technology shall be submitted to and approved in writing by the Local Planning Authority. The details following requirements must demonstrate compliance with the reductions set out in the Energy Assessment (ref LEC 3009/R01_2 Low Energy Consultancy Ltd, 29 November 2018).

1 - Details of the CHP should also include the heat network, the plant type and its location. Full details of the fuel inputs and energy outputs shall also be presented.

2 - Details of the PVs, including fixing mechanisms, pitch, orientation and plans (roof and elevations) shall also be included.

The development must proceed in accordance with the approved plans.

Reason:

To ensure the proposals contribute to a reduction in CO2 in accordance with London Plan (2016) Policy 5.2.

Observations - Amenity Space

The wind and sunlight analyses reveal that the courtyard area is likely to be constrained through both shading and increased wind. This reduces the enjoyability of the area. It is therefore recommended that an offsite contribution is secured to improve existing recreational facilities in the nearby area.

The S106 contribution should be set at £30,000.

Case Officer's comments

The Council's Sustainability Officer has been informed of the contributions already agreed by the developer to improve the public realm within the locality and the proposed over provision of external amenity space. Following discussions the Council's Sustainability Officer has confirmed that the additional payment of £30,000 is not justified and is therefore not required.

FLOOD AND WATER MANAGEMENT OFFICER

The proposals suggested that the indicated strategy will control surface water run off from the 1.8ha site to 6ls for events up to and including the 1 in 100 year plus 40% climate change event, which is considered acceptable.

However although there is considerable more detailed explaining the options initial considered and discounted, it is not clear that the best solutions have been incorporated and further work will be required in order to discharge the appropriate condition.

For example although ground water has been found, this does not and should not completely rule out shallow depressions to capture the first flush of rainfall in landscaped areas and this must be explored within any landscaping plan and levels provided for the site.

In addition there are proposals to provide drainage within an area set aside for future works. This area is proposed for an extension of cycleways along Pump lane. The proposals for the site should be revised so that the drainage for the site is entirely within the site extent and not area which will be disturbed later by Cycleway pedestrian works. A contribution for this work to improve the cycleway and provide additional green infrastructure / rain gardens to mitigate for the air quality and flooding issues along Pump lane will be expected. The permeable area for this site should also not include this area.

It is also noted that the proposed connection into the SW sewer does not lead anywhere and a CCTV survey was to be undertaken to provide an indication of the destination location and that the TW sewer is suitable to receive these flows.

It is noted a indicative maintenance plan is included this should incorporate all elements of a drainage proposal including pipework and ability to respond to adhoc issues arising. This could be conditioned.

Case Officer's comments:

The Council's Flood and Water Management Officer has been informed of the applicant's agreement to make significant contributions for pedestrian and cycleway improvements and has confirmed that this is acceptable. The applicant has agreed to remove any drainage elements from within land on Pump Lane that may be required for future cycle or bus services, this will be captured by an appropriately worded condition.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Within the adopted UDP the site is classified as an Industrial Business Area. Saved Policy LE2 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states: Industrial and Business Areas (IBAs) are designated for business, industrial and warehousing purposes (Use Classes B1-B8) and for Sui Generis uses appropriate in an industrial area. The Local Planning Authority will not permit development for other uses in IBAs unless it is satisfied that:

- i) There is no realistic prospect of the land being used for industrial or warehousing purposes in the future, and;
- ii) The proposed alternative use does not conflict with the policies and objectives of the plan
- iii) The proposal better meets the plan's objectives particularly in relation to affordable housing and economic regeneration.

In applying Policy LE2, the Local Planning Authority will where appropriate take into account (1) evidence of a lack of demand for industrial and warehousing uses; (2) the length of time the vacant premises or land have been marketed and interest expressed by potential occupiers; (3) the amount and nature of vacant industrial and warehousing floorspace and land in the Borough, as well as outstanding unimplemented planning permissions and development under construction; (4) the size and layout of existing premises will also be taken into account.

The proposal does not strictly adhere to Policy LE2 as it is for a residential-led development. However within the emerging Local Plan Part 2, Policy SA22 (Part A), the site is allocated for residential led mixed use development and is released from its current SIL designation. The LDF Employment Land Study - July 2009 supports the release of this site.

Draft Policy SA 22: Chailey Industrial Estate, Pump Lane, proposes:

'The Chailey site is currently vacant and provides an opportunity for residential development that enhances Hayes Town Centre and takes advantage of the future Crossrail link at Hayes. The following development principles will apply:

- The site should be released for residential development at a development density of 110 units per hectare,
- Small scale commercial uses at ground floor level to support residential uses will be considered suitable; and
- Development proposals should include a buffer along the eastern boundary of the site to mitigate impacts on residential amenity from the adjacent retail use.

- The Council will seek to achieve a proportion of community infrastructure on the site to assist in the regeneration of Hayes;
- Proposals should be provided to a high quality design; and
- Open space and amenity space should be provided in accordance with Council standards.'

For Hillingdon, the London Plan sets a housing delivery target of a minimum of 5,593 new homes between 2015 and 2025 (559 per annum). Local Plan Core Strategy Policy H1 seeks to maximise the supply of additional housing in the Borough and states the Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.

With regard to the proposed use, the development comprises a residential scheme (within Use Class C3) with ancillary commercial uses. The National Planning Policy Framework 2018 (NPPF) seeks to significantly boost the supply of housing and as such, the supply of housing is considered to be a public benefit. Paragraph 61 of the NPPF states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward and where it is needed, that the needs of groups with specific housing requirements are addressed. London Plan Policy 3.3 recognises the need for more homes in London in order to promote opportunity and provide a real choice for all Londoners.

Policy BE14 of the Local Plan: Part 2 - Saved UDP Policies (2012) outlines that permission will not be granted for the development of sites in isolation if the design fails to safeguard the satisfactory redevelopment of adjoining sites which have development potential. Within the SOPM (2018), the adjacent site to the east has been identified for redevelopment as Part B of SA 22.

The proposal incorporates an 11m setback from the neighbouring site to the East, in order to assist in safeguarding the redevelopment of this site. Furthermore, in the interim period where the neighbouring site will continue to operate in its existing form, this setback will minimise any potential friction arising between the new residential units and existing commercial use. The proposal also incorporates part of the sites' non-residential commercial use on the North Eastern ground floor, in order to ensure a more complementary use opposite the entrance to the existing Matalan store.

The proposal successfully demonstrates how the redevelopment of Site B could be undertaken cohesively in line with this scheme, particularly in terms of demonstrating how new connectivity from East to West has been incorporated. Furthermore, onsite amenity space provision on both the 'green boulevard' and the eastern boundary of the site would create new green infrastructure in an area with a notable shortage (DIFS, 2017). In particular, the proposed 'woodland area' on the eastern boundary provides an opportunity for integration with future amenity space from Site B.

The site also abuts Strategic Industrial Land (SIL) to the south east which is occupied by a number of existing businesses. It is therefore important that new development does not compromise the integrity or effectiveness of this SIL in accommodating existing or future business, in line with Policy 2.17 of the London Plan (2016). It is considered that the development proposal avoids doing so by incorporating sufficient setbacks and introducing significant planting to create a green buffer between potentially incompatible uses.

Policy at local, regional and national levels therefore acknowledges the need to provide new

homes. It is considered that the nature and deliverability of the proposed development within a predominantly residential area would contribute positively and actively to meeting the overall housing requirement for Hillingdon over the Local Plan period.

The proposed commercial space (Use Classes A1, A2, A3, B1, D1 or D2) is deemed ancillary to the residential use of the site. Amenity issues relating to this proposed commercial use are discussed throughout the report. The proposed location of the commercial uses offers optimum opportunity to deliver viable commercial premises for Hayes.

Accordingly the proposals accord with Local Plan Core Strategy Policy H1, Saved Policy BE14 of the Hillingdon Local Plan (November 2012), the emerging Local Plan Part 2, Policy SA22, Policy 2.17 of the London Plan (2016) and the NPPF.

7.02 Density of the proposed development

The proposed scheme includes 333 dwellings across the 1.8 ha site area, which equates to 185 dwellings/ha.

The site has a PTAL rating of 2/3 and Policy 3.4 of the London Plan seeks for new developments to achieve the appropriate density which is compatible with the local context. Table 3.2 of the London Plan recommends that for a PTAL of 2/3, with smaller sized units of 2.7 to 3 habitable rooms that a density of 70-170 is appropriate. The proposed scheme has a density of 185 units per hectare which sits just outside the upper density range recommended by the London Plan (March 2016). However given the close proximity of the site to the new Crossrail Station at Hayes and Harlington and its proximity to the adjacent Town Centre, the proposed density is considered acceptable in this location.

Unit Mix

In ensuring a range of housing choice is provided to residents, London Plan Policy 3.8 states that new developments should offer a range of choices, in terms of the mix of housing sizes and types. Saved Policies H4 and H5 of the Hillingdon Local Plan (November 2012) seek to ensure a practicable mix of housing units are provided within residential schemes.

The development proposes the following mix of units:

- Studio x 29 units
- 1 Bedroom x 88 units
- 2 Bedroom 3 Person x 48 units
- 2 Bedroom 4 Person x 113 units
- 3 Bedroom x 55 units

The Council's Policy Team have reviewed the submitted housing mix and raise no objections. Saved Policy H4 of the Hillingdon Local Plan (November 2012) encourages one and two bedroom developments within town centres and given the location of the site in close proximity to Hayes town centre the mix proposed, which includes a proportion of larger units at 16.5%, is deemed acceptable and appropriate and in accordance with Saved Policies H4 and H5 of the Hillingdon Local Plan (November 2012).

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

The area is mixed use in character and is not within a Conservation Area or an Area of Special Local Character. There are no listed buildings within or directly adjacent to the site, however the Grade II Listed Benlow Works building and the locally listed Silverdale Road warehouses are located to the south of the site.

A Heritage Impact Assessment has been prepared in support of the application which recognises Benlow Works as a Grade II listed factory building and that the factory is of historic and architectural significance with some decorative features of interest. The report concludes that the development would introduce further taller buildings into the setting of Benlow Works where it would respond to the local architectural character and improve what is currently an area of poor townscape and visual quality. The change to the setting would be neutral and the development would preserve the significance of the surrounding listed buildings.

The Council's Conservation and Design Officer has been involved throughout the pre-application discussions and has requested some amendments to the scheme. These have been incorporated into the final design and no objections have been made to the proposals. In addition the closest heritage assets are not directly adjacent to the site but separated by existing buildings. As such the impact of the proposals on the nearby Grade II Listed Benlow Works building and the locally listed Silverdale Road warehouses are considered acceptable and in accordance with Policy BE10 of the Hillingdon Local Plan (November 2012).

Archaeology

NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. In addition paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public. The planning application lies in an area of archaeological interest and an archaeological desk-based assessment has been submitted to accompany the application.

The Greater London Archaeological Advisory Service were consulted on the proposals and have provided detailed comments. The archaeological desk-based assessment (DBA) that accompanies the application states the site has low archaeological potential partly due to severe, widespread and cumulative impacts from previous development. Whilst there is some validity in these suppositions the study does not in the opinion of GLAAS properly consider the potential for Palaeolithic archaeology at the interface of the natural gravel and brickearth (Langley Silt). Wherever Langley Silt survives in-situ it has potential to seal and preserve prehistoric land surfaces containing evidence of human remains and/or associated fauna. The London Region has been described in the London archaeological research framework as one of the most important in Europe for the Lower Palaeolithic and the Langley Silts of West London are one of the physiographic zones highlighted.

The Greater London Archaeological Advisory Service have therefore concluded that the development could cause harm to archaeological remains and an appropriately worded condition requiring a two stage field evaluation is needed to determine appropriate mitigation.

Subject to the attachment of this condition and an informative no concerns are raised with regards to archaeology.

7.04 Airport safeguarding

National Air Traffic Services (NATS) and Heathrow Airport Ltd have been consulted on the proposals and whilst they are the view that the proposed development is expected to impact its operations, in particular the radar system and the potential for bird strike issues, both NATS and Heathrow have stated that they are of the view that any impact can be mitigated through a modification to the radar system.

Both NATS and HAL have requested similar conditions with regards to the H10 Radar at Heathrow. To avoid repetition a set of conditions have been proposed by the case officer to cover the above requirements that have been agreed as acceptable in writing by both NATS and HAL. These conditions are recommended to be attached to any grant of planning consent. As such the proposals are deemed to have no impact on airport safeguarding.

7.05 Impact on the green belt

The site is not located within or close to the Green Belt, as such there are no Green Belt issues relating to this application.

7.07 Impact on the character & appearance of the area

Policies BE13 and BE19 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) seek to ensure that new development complements or improves the character and amenity of the area.

Policy 7.1 of the London Plan (March 2016) 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 optimizing the housing potential/density of sites (Policy 3.4) and sustainable design and construction (Policy 5.3) are also relevant.

The proposal comprises three buildings that range from 2 to 11 storeys. These buildings are subdivided in blocks within the proposed plans to enable clarity of the development proposed.

The western building comprises Blocks A and B, with Block A rising to a maximum of 5 storeys along Pump Lane, whereas Block B steps down to 2 storeys where it is adjacent No.20 Chalfont Road. The building is linear with active frontages presented to Pump Lane and towards the internal proposed 'Home Zone'. Duplex units have been created to assist in activating this frontage with access doors onto the streetscene as opposed to shared central access cores. Parking is proposed to the rear/west with a podium providing external amenity space above. Landscaping is proposed along the edge of the podium area to prevent overlooking and protect the privacy of adjacent occupiers. A landscaping strip is also proposed between the podium and the site boundary.

The largest of the three buildings comprises Blocks C to G and varies in height between 6-8 storeys along the Pump Lane frontage and rises up to the highest point at 11 storeys in the south east corner. Duplex units have again been included to activate the western and southern elevations. This building (within Blocks D, E and F) includes the proposed commercial units at ground floor level along the Pump Lane frontage and the eastern section closest to the adjacent Matalan store. The Pump Lane frontage varies in height and includes a significant (circa 10m) set back along Pump Lane. The proposals maintain architectural quality throughout the development and particular attention has been paid during the pre-application and design process to breakdown the mass and form of the development along Pump Lane to reduce its impact. High quality materials are proposed and differing colours of bricks proposed to create an architectural language where the building is broken down into sections. The Pump Lane elevation would be two storeys in height at the western end of the site to reflect the height of existing residential buildings which sit adjacent to the site. The building height then steps up west to east so that the tallest section is adjacent to the existing Matalan store. The heights are considered appropriate in this location and the proposed set back from Pump Lane creates additional public realm and 'breathing space' for the mass proposed. In addition the design of development is considered to have an acceptable impact on the current adjacent Matalan

Store, but also to any future redevelopment of the adjacent site should it come forward in the future.

The smaller building towards the south eastern corner of the site comprises 4 and 6 storey elements. This building includes Blocks H and J with parking proposed externally to the west. To the east of the block an area of landscaping is proposed that will separate the block from the adjacent existing industrial uses.

The massing of the scheme has been designed to relate to the streetscape and townscape of its surroundings with the tallest part of the development being proposed towards the commercial properties along the eastern boundary of the site and lower elements adjacent the established residential properties along Chalfont and Little Road. The majority of the scheme is proposed to be masonry construction to tie in to the surrounding area. A full materials condition is recommended to be attached to any grant of planning consent.

The scheme proposes to introduce a 'home zone' area and traffic calming measures to create a residential environment with additional public realm and 'livable streets' that will integrate with adjoining roads. The elevations surrounding this area are proposed to be active and the entrance to the central parking area has been moved from the centre of the site to close to the Pump Lane site access to reduce vehicle movements within the site itself.

The proposed scheme has been subject to lengthy pre-application discussions and the applicant has responded positively to suggestions made by officers to improve the quality of design, undertaking a number of revisions to produce a scheme that is considered acceptable in design terms. Officers requested a comprehensive Visual Impact Assessment report be produced to enable a thorough understanding of the impact the scheme would have on the locality. This required a total of 23 viewpoints within a 2km radius of the site which has been submitted with the application and includes long and short distance views as requested. The GLA have also requested six further additional views from Austin and Little Road be produced and these have also been submitted. These clearly show that the tallest element is not seen from the relevant vantage points and therefore there is no impact to the properties located on Austin and Little Road.

The proposal is considered to be well thought out and to respond positively to the site and surrounding area. The Council's Urban Design and Conservation Officer has provided the following list of elements within the scheme that are considered positive in design terms:

- 1) Introduce a setback from Pump Lane that will be circa 10m. This setback has many benefits that includes a) the increased provision of public realm, considering the deficit identified in Hayes, b) allowing for the future provision of highways intervention and mitigation measures to support the increased growth of Hayes in the Pump Lane area that includes cycling and potential buses in the longer term, c) setback that is commensurate to the scale of development proposed on the site to mitigate the impact of increased building heights and massing, for example, against the prevailing existing context to the north, d) reduce the air quality impact on residential dwellings and associated amenity space, if set away from the negative AQ areas along Pump Lane.

- 2) Provide a central 'green' public open space and a range of supporting 'green' landscaped curtilage spaces within the development site that are meaningfully (usable) sized to address a) the increased provision of public open space, considering the deficit

identified in the Hayes DIFS, b) supplement the required level of amenity space provision for residents, c) introduce SUDs for surface water drainage that is integrated into the landscape strategy, d) mitigate air quality concerns with increase planting, e) increase biodiversity to encourage new and support existing habitats, f) mitigate (soften) the impact of the proposed development, g) contribute to the reduction of the potential cumulative 'urban heat island' effect of new development in Hayes, h) create a range of landscaped spaces that vary in size, use and levels of privacy inc. play areas that are evenly distributed across the development site, responding to the developments requirements and residents needs - this will add richness and character to foster placemaking.

3) Introduce new employment uses to, a) mitigate losses of the existing site land use, b) promote active frontages along Pump Lane and generally activate the development outside of residential usage hours, c) support emerging wider employment strategies for Hayes that is responding to new employment trends.

4) Create a variety of scale and form within the development to, a) respond to the varying edge conditions, b) optimise site to balance quality and quantity, c) reduced the impact of the development on neighbouring properties, d) positively contribute to the townscape setting in Hayes.

5) Introduce a development podium typology that integrates a) parking within a podium deck to reduce the impact of on-street parking, b) create 'front doors onto street' to activate the public realm, c) introduce family duplex and/or triplex dwellings at the ground floor with a 'back garden' onto the first floor podium deck, d) create an adequately sized semi-private podium deck amenity space for residents with planting etc.

6) Introduce a home zone, a) create a residential focused public realm and 'livable streets', b) reduced on-street parking to increase the quantum of public open space, areas of play, landscaping and permeable ground for SUDs.

7) Allow adequate setbacks from neighbouring sites a) not to constrain emerging and identified development opportunities i.e Matalan, b) to mitigate the impact of active employment and industrial uses on the proposed residential areas of the development, c) to ensure the sustainability of the existing employment uses that are not impacted by new residential development, c) create an improved interface that reduces the impact on existing residential houses and their curtilage space.

8) Not to consider the site in isolation, therefore a wider 'connectivity' strategy has been developed to ensure the site's positive integration with a) neighbouring sites and land uses, b) town centre core, c) canal and 'Quietway', d) Crossrail station.

9) Maintain architectural design quality throughout the development to a) create a bespoke development that is contextual, articulate in form and legible (plus varied) in use - fostering the principles of placemaking, b) breakdown the mass and form of the development to reduce its impact, c) introduce high quality materials and robust detailing, d) create an interesting and varied roofscape.

The Council's Urban Design and Conservation Officer has provided the following conclusion to their comments:

'The applicant has successfully met these objectives (discussed above) through design development and positive consultation with Officers. The scale of the development ranges from six to eight storeys, and dropping down to five and four storeys, in response to the

varying edge conditions of the site. A taller eleven storey feature building is located towards the centre of the site that has been oriented and architecturally treated to reduce its immediate impact, whilst making a positive contribution to the emerging Hayes setting. The overall scale of development has been rigorously tested through a comprehensive TVIA, with Officers agreeing the various and numerous points that views should be taken from. For these reasons, the scale and form of the development is acceptable in townscape terms. And the residential-led mixed use development will make a positive addition to Hayes in regeneration terms, helping to raise the bar of future development. It is important that the scheme is not 'value engineered' post planning. Therefore a standard condition on materials is required and Officers will not accept the use of render that is not considered a robust material for this location or anywhere in the proposed development site.

This approach will balance the quantity proposed to optimise the site for redevelopment, with the quality required to create a successful residential-led development that will contribute to the positive growth of Hayes. The proposed scheme in it's current form is supported and recommended for approval on Design and Conservation grounds.'

As such the overall development is considered to be well designed and will have a positive impact on the visual amenities of the surrounding area. The numerous positive elements of the proposals as set out in the Design and Conservation Officer's comments are considered to result in a proposed scheme that is in accordance with Policies BE13 & BE19 of the Hillingdon Local Plan (November 2012).

7.08 Impact on neighbours

Policy BE21 of the Hillingdon Local Plan: Part Two 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 Council's Supplementary Planning Document 'Hillingdon Design and Access Statement' (HDAS) states that where a two or more storey building abuts a property or its garden, adequate distance should be maintained to overcome possible over domination. The distance provided will be dependent on the bulk and size of the building but generally 15m would be the minimum acceptable separation distance.

The proposed development would be separated by a minimum of 30m from two properties on the northern side of Pump Lane, with a third property 36.5m away. The majority of properties on the other side of Pump Lane would be in excess of 40m from the proposed development. It is considered that the separation distances proposed would be sufficient to avoid overdominance to these adjoining properties.

With regards to the impact of the scheme on properties on Little Lane, the scheme is proposing a single storey parking area with landscaped podium above along the majority of this boundary, with a strip of landscaping along the boundary itself to soften the visual impact of the development. The built form would be approximately 16.5m at the closest point from the rear elevation of these dwellings. This separation distance is above 15m and critically there are two large existing double storey industrial buildings with an existing height of 8.66m, which are presently located along the majority of this shared boundary. As such the introduction of the single storey podium with additional landscaping strip is considered to result in a reduced level of overdominance to these adjoining properties when compared to the current larger/higher structures in situ.

No. 20 Chalfont Road will be the closest existing dwelling to the proposed built form. This dwelling would be sited alongside the southern elevation of Block B which is proposed to be a two storey building, to match the existing adjacent property, with the single storey

podium to the rear. The podium is proposed to be located between 2.0m and 2.7m off the shared boundary with No. 20 Chalfont Road. Whilst the podium in this location could be considered to appear as a significant structure when viewed from the rear garden of the adjacent property, there is an existing two storey industrial building located hard against this boundary which also has a large gable elevation that reaches a height of approximately 8.66m. As such the proposed podium represents a significant reduction in built form in this location that would be set further from the boundary than the existing structure and soft landscaping is proposed on the boundary to soften the visual impact further.

No. 20 Chalfont Road would be over 27m from the proposed built form to the north across the proposed central landscaped area. All of the properties on the eastern side of Chalfont Road would have separation distances in excess of 30m from the proposed built form to the east (Block H and Block J).

It is considered that the separation distances proposed would be sufficient to avoid overdominance to these adjoining properties and as such, would not detract from the amenities of neighbouring occupiers, in compliance with Saved Policy BE21 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and relevant design guidance.

The scheme has also been designed to introduce an 11m wide gap between the eastern facades of the proposed built form (Blocks F to J) and the eastern boundary of the site. This will ensure that should the adjacent Matalan site be developed in the future a layout can be proposed which mirrors this gap to create policy compliant separation distances.

Privacy

Policy BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) seeks to ensure that the design of new buildings protects the privacy of the occupiers and their neighbours. The supporting text to this policy states that 'the protection of privacy, particularly of habitable rooms (including kitchens) and external private amenity space is an important feature of residential amenity'.

The Council's HDAS also provides further guidance in respect of privacy, stating in particular that the distance between habitable room windows should not be less than 21m. The Council's HDAS at paragraph 4.12 states that 'new residential development should be designed so as to ensure adequate privacy for its occupants and that of the adjoining residential property from windows above ground floor, an angle of 45 degrees each side of the normal is assumed in determining facing, overlooking distances. This requirement has been adhered to so as to respect the residential amenity of existing residents by maintaining a minimum distance of 21 metres from existing residential developments.

Concerns have been raised with regard to the proposed podium to the rear of Block B in relation to a loss of privacy through overlooking of the rear gardens of properties on Little Road and the northernmost property on Chalfont Road. The proposed landscaping scheme prevents future residents from accessing the western edge of the podium and through appropriate boundary treatments. It is recommended that these treatments are secured by an appropriately worded condition to ensure that there is no potential for loss of privacy to these properties. The proposed access stairs on the southern end of the podium also create a potential risk of overlooking to the rear garden of the adjacent property No. 20 Chalfont Road. Details of this access are recommended to be controlled through an appropriately worded condition to protect the amenity of the neighbouring property. This could be achieved with privacy screens or an enclosure for the stairs.

All of the properties on the eastern side of Chalfont Road would have separation distances in excess of 30m from the proposed built form to the east (Block H and Block J). In addition each of these properties have a large outbuilding located at the end of their gardens which further prevents any risk of overlooking.

Subject to the above conditions, the proposed separation distances are considered to be consistent with Saved Policy BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and relevant design guidance.

Daylight and Sunlight

There is no national Planning Policy specifically relating to daylight, sunlight and overshadowing. The Supplementary Planning Guidance on Housing in March 2016, published by the Mayor of London states "An appropriate degree of flexibility needs to be applied when using the BRE guidelines to assess the daylight and sunlight impacts of new developments on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, larger sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."

Saved Policy BE19 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) states that the Local Planning Authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area. The supporting text goes on to state that ensuring adequate sunlight and daylight reaches both habitable rooms (including kitchens) and external private amenity space is an important principle of housing design which affects the enjoyment of occupants' living conditions. The Local Planning Authority will pay full regard to the effects of a proposal, whether it be for a new building or extensions of an existing one, on the sunlight and daylight reaching neighbouring properties, and will have regard to the recommendations of "Site Layout Planning for Daylight and Sunlight" (Building Research Establishment, 1991).

Saved Policy BE20 states that buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded. Whilst saved Policy BE21 states that planning permission will not be granted for new buildings which would result in a significant loss of residential amenity.

The application is supported by a daylight and sunlight report that considers the potential daylight / sunlight effects of the proposed development. The quality of the daylight and sunlight within the neighbouring properties has been assessed using processes recommended within the BRE document 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice'. The BRE guidelines are not mandatory and the document should not be seen as an instrument of planning policy. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design.

In developing a former low-rise industrial site a degree of change is inevitable, however the results demonstrate that the the scheme responds to its context in order to limit the effect on the amenity of neighbouring dwellings in terms of either daylight or direct sunlight. The report conclusion states that 'our findings of our analysis demonstrate that considering the urban context of the site the aims of the BRE guidelines are achieved. Therefore, the proposals will not have a significant effect on the neighbour's enjoyment of daylight and

sunlight and the proposals themselves will have good access to daylight and sunlight.

As such it is not considered that there would be a material loss of daylight or sunlight to neighbouring occupiers to such an extent as to warrant a refusal of the current application. The proposal is considered to be consistent with Policies BE19, BE20 and BE21 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

Commercial Use

There are no concerns raised regarding the impact of the proposed commercial unit on adjacent occupiers subject to conditions regarding hours of use, noise and extraction flues. These conditions are recommended to be attached to any grant of planning consent. The proposed commercial premises would be separated by a minimum of 30m from the closest existing residential properties.

7.09 Living conditions for future occupiers

Internal Space Standards

All of the dwellings proposed comply with the internal space standards as set out in Table 3.3 'Minimum Space Standards for New Dwellings' of the London Plan 2016 and the Technical housing standards - nationally described space standard (2015).

Amenity Space

The podium roof gardens above the proposed car parks within the development serve as communal amenity space with defensible private space adjacent to properties to serve residents within the development. A large area of public open space is proposed within the centre of the site and along the eastern boundary. At ground floor level 3213m² of shared amenity space is proposed (in addition 2755m² of new public realm is proposed that, whilst not representing accountable external amenity space, does contribute additional amenity for future and existing residents).

At first floor level 2474m² of shared amenity space is proposed within the shared podium areas. In addition 2,808m² of private amenity space is proposed in the form of terraces and balconies. In total therefore 8495m² of external amenity space is proposed (in addition to the 2755m² of new public realm).

The development proposed is required to deliver the following amenity space:

29 x studio units and 88 x 1 bedroom flats = 2340m²

161 x 2 bedroom flats = 4025m²

55 x 3 bedroom flats = 1650m²

In total therefore 8015m² of external amenity space is required. The amount of amenity space proposed accords with and exceeds (an additional 480m²) the requirements outlined in Hillingdon's Design and Accessibility Statement Supplementary Planning Document - Residential Layouts SPD (2006) and GLA guidance.

Child's Play

The scheme generates a yield of 99 children, and the GLA requirement for play space is 978 sq.m which will form part of the amenity provision identified above. The scheme has developed an overarching play strategy which proposes a significant provision of dedicated play space for under 5's and 6-11 age groups as well as significant opportunities for natural play within the various amenity spaces.

Overshadowing of Amenity Space

The site layout, orientation of the proposed buildings and the separation distances

proposed are intended to minimise overshadowing across the site. The Council's Sustainability Officer has reviewed the scheme and raised a concern that the sun path analysis shows shading to the courtyard areas that may constrain the usability of the courtyard areas as amenity space. However following discussions regarding the over provision of external amenity space and the contributions already agreed by the applicant for recreational improvements such as cycleways, the Council's Sustainability Officer has confirmed that the contribution he requested is no longer necessary.

Daylight/sunlight

An analysis has been undertaken to consider the level of daylight the proposed accommodation will enjoy. The results of the analysis demonstrates that over 90% of all habitable rooms analysed on the lower three floors will achieve or exceed the recommended level of daylight. This would be almost 100% if balconies were not proposed. The proposed accommodation will enjoy a good level of daylight and all units benefit from an area of private amenity space.

The analysis results for those rooms with a principle window facing within 90 degrees of due south demonstrate that over 71% of the rooms will achieve the numerical values set out in the BRE guidelines. In addition, they demonstrate that as recommended, all except 7 bedrooms will enjoy sunlight at some point during the day, as recommended within the Mayor of London's Housing SPG. The principle reason why not all rooms will achieve the numerical values in the BRE guidelines, is due to the provision of private amenity space, such as balconies which can block direct sunlight.

Given that the Supplementary Planning Guidance on Housing in March 2016, published by the Mayor of London states that 'guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, larger sites and accessible locations, where BRE advice suggests considering the use of alternative targets', it is considered that the results demonstrate that the proposed accommodation will enjoy an appropriate level of sunlight.

Privacy

As detailed within section 7.08 of this report the separation distances between the existing properties and the proposed development are considered to be acceptable.

Internally the separation distance between Blocks A & B and Blocks C & D will be a minimum of 21m to protect residential privacy and amenity where windows will directly face each other. Between Block G and Block H the separation distance would be a minimum of 16m. Whilst this would only affect dual aspect rooms in Block H, it would affect single aspect rooms in Block G. The distance proposed is below the level of separation distance required to protect residential amenity. It is therefore recommended that a condition be attached to any grant of planning consent that requires details of an architectural solution (such as oriel windows or louvres with elements of obscure glazing) be provided.

At higher levels the separation distance between Block F and Block G is 16.6m. A condition is therefore required to ensure that the windows in the southern elevation of Block F remain fixed shut and obscure glazed. The windows in this elevation are secondary windows and therefore such a condition will not impact on outlook for future occupiers. At first floor level the proposed separation distance between Block C and Block G is 17.2m, however no windows are proposed in the western elevation of Block G at this level. At upper levels this separation distance increases to 30m.

Within the internal corners of the scheme where blocks meet at right angles the windows have been located to reduce overlooking and allow only acute angled views. This is deemed preferable to the use of large numbers of privacy screens which could have a detrimental impact on the outlook of properties. Subject to the above condition it is considered that the separation distances proposed and the location and angle of windows will create a development that provides acceptable levels of privacy for future occupiers. The proposal is therefore considered to be consistent with Saved Policy BE24 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) and relevant design guidance.

Outlook

The vast majority of the proposed units will be dual aspect with the number of single aspect dwellings reduced through the design process in discussions with officers. The number of single aspect north facing units is considered minimal with no such units proposed in Blocks A, B, C, H and J. In total 20 out of 333 units is proposed as single aspect north facing which equates to 6% of the number of units proposed. No three bed family units are proposed as single aspect north facing. Given the use of standard access lift cores/corridors in developments of this nature, the mix of single and dual aspect units is deemed acceptable. All of the proposed units will have outlook over the internal podium area, the existing streetscene or have longer views and will benefit from acceptable levels of outlook. The proposals are therefore deemed to be in accordance with Policy BE21 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) in terms of outlook.

Neighbouring Uses

The redevelopment of this site borders Strategic Industrial Land (SIL) to the south east which is occupied by a number of existing businesses. It is considered that the development proposal incorporates sufficient setbacks and introduces significant planting to create a green buffer between these potentially incompatible uses. A Noise Impact Assessment report has been submitted with the application which concludes that the proposed development should avoid future residents being exposed to harmful levels of noise. It can therefore be concluded that significant adverse impacts on the health or quality of life of those future residents would be avoided, in line with the aims of the NPPF. This is covered in greater detail within section 7.18 of this report.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The National Planning Policy Framework (NPPF) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

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

Policy 6.3 of the London Plan requires development proposals to ensure that the impacts on transport capacity and the transport network are fully assessed.

The site is currently served by three points of access which are located along the Pump Lane site frontage. Whilst the site at present is served by minor access roads which include Little Road to the west of the site and Chalfont Road/Silverdale Road to the south,

these access points are currently closed off. The proposed development will see the stopping up of all existing access points currently serving the application site along Pump Lane. These are to be replaced by one access along the north-western edge of the site boundary (with Pump Lane). The proposed access will provide a 6.0 metre wide carriageway width with footway in excess of 2.0 metres either side.

An emergency site access is also to be provided south of the site in the position of the existing access point and will be used solely for pedestrian, cycling and emergency access via Chalfont Road. It should be noted that whilst this access is to remain open 24/7, collapsible bollards are proposed in order to allow emergency vehicles access. The eastern most access along Pump Lane will accommodate service vehicles accessing the plant room which is to take place once every 3-4 months. It is mentioned that the type of vehicles carrying out this service will comprise of small vans only. A new pedestrian access is also proposed to be located towards the south eastern boundary of the site which will be accessed off Silverdale Road.

To assess the traffic impact of the proposed development a Transport Assessment has been submitted in support of the proposed development. .

Trip Generation

When comparing both existing and proposed uses, the net increase in traffic movements is concluded to be 37 movements during the AM peak and 3 movements in the PM peak periods. The net increase during the AM period would average 1 vehicle every two minutes entering/leaving the site. The Council's Highway Engineer notes the traffic generation of the proposed development and considers this increase is limited and can be accommodated without detriment to the existing highway network.

Car Parking - Residential

209 car parking spaces are proposed that will include 3 spaces for the proposed commercial units, 204 residential parking spaces and 2 car club parking spaces.

The Council's adopted car parking standards are based on a maximum approach and that some degree of flexibility can be provided given the site's relatively sustainable location in relation to the Hayes Town Centre. The current scheme provides residential car parking at 62% (0.62 per unit). In accordance with currently adopted saved Unitary Development Plan, a recommended maximum parking provision of 441 should be provided on site to serve the new units and does not therefore accord with the UDP standard or the emerging LPP2 DMT6 policy and parking standard for residential developments.

The site has a PTAL rating of 3 which on a scale of 1-6b is considered to be moderate. It is noted however that the site is within a relatively short walking distance to the Hayes Town Centre which provides a plethora of sustainable transport modes. This is reflected with a high PTAL rating of 4 and 5 within Hayes Town Centre which is circa 200m from the site.

It should also be noted that with the introduction of Crossrail which is to commence later in 2019 and the introduction of an extended (H32) bus service along Pump Lane, the area will see improved provisions for sustainable modes of travel. If the linkages between the development and Hayes town centre are convenient and attractive to use, then future residents of the development will be less reliant on the private car to meet their daily travel needs. This could include improvements to the pedestrian routes along Pump Lane as well as the Grand Union Canal Cycle Quietway.

Funding is therefore required for investment in measures that better connect the development site with Hayes town centre and Hayes and Harlington Station. With attractive and convenient measures for pedestrians and cyclists in place the Council can be confident that these will offer a genuine travel alternative to the private car. This opportunity to better connect the development with Hayes town centre has been taken into account when assessing the quantum of car parking spaces proposed on the site.

The Council's Highways Engineer has requested a contribution of £250,000. This would be used towards the following:-

- The upgrade of pedestrian and cycle facilities along Chalfont Road and Silverdale Road
- A complete transformation of the land outside Skeffington Court. The key objective being to make this a direct, attractive, safe and convenient route for pedestrians and cyclist walking and cycling to the town centre; and
- Improving access to the Grand Union Canal towpath from Silverdale Road

Also a £50,000 contribution for upgrading the canal towpath to Quietway standard has also been requested.

In addition to the above Transport for London have requested a contribution of £25,000 each year for three years towards local bus services. This has also been agreed by the applicant.

It is therefore considered that subject to an appropriate contribution, on balance, the level of parking proposed is sufficient for the residential component of the proposals. The applicant has confirmed their acceptance of the proposed level of contributions and these would be secured via a section 106 legal agreement. An amended Travel Plan plus £20,000 bond would also be secured via a section 106 agreement for both the residential and commercial elements of the scheme.

It should be noted that in addition to the above significant improvements to Pump Lane have already been secured through the Southall Gas Works scheme in the neighbouring borough of Ealing.

Disabled Parking

To accord with both the currently adopted UDP standard and the emerging Local Plan: Part 2 DMT 6 policy, it is required that 10% of parking provision be allocated to blue badge holders. Under the proposed level of parking for the residential units it is required that 21 spaces be allocated to disabled users. Whilst it is proposed that 34 spaces be allocated thus representing an overprovision of 13 spaces, this is deemed acceptable.

Electrical Vehicle Charging Points

Provision for electrical vehicle charging points has been provided in excess of the London Plan standards which require 20% active spaces and a further 20% as passive. The submissions propose that 20% as active provision and 54% as passive provision as a measure of mitigation. This represents 41 'active' spaces and 112 'passive' spaces.

Cycle Parking

There are 549 + 8 Visitor secure cycle storage spaces for residents. Long stay parking will be located within covered storage with short stay cycle parking being provided at a ratio of 1 space per 40 units. Whilst this is in accordance with the London Plan standards, this is considered an over provision when compared to the 388 spaces required as per the UDP standards. It is recommended that a condition be attached to any grant of planning consent

to monitor the level of cycle parking proposed and if there is evidence of an over provision that cycle parking spaces be allocated for alternative uses that would enhance residential amenity.

Motorcycle Parking

10 Motorcycle parking spaces have been proposed, which equates to one space per twenty car parking spaces. This is in accordance with Council requirements.

Car Parking - Commercial Units

The submissions seek flexible commercial floor space (Use Classes, A1, A2, A3, B1, D1 or D2). When considering the quantum of development and in accordance with the Saved UDP standards, it is required that 14 parking spaces be provided. It is apparent from the submitted information that only 3 spaces are proposed for staff with no parking being provided for visitors on site. Whilst this represents a shortfall in parking, given the sites sustainable location and that any potential commercial parking taking place could be controlled via a CPMP (Car Parking Management Plan) plus a commercial Travel Plan (and £20,000 bond) the Council's Highways Engineer is of the opinion that this level of provision is acceptable.

In addition to the above the Council's Highways Engineer has requested conditions be attached to any consent that require a car parking management plan and construction management plan be submitted and approved in writing by the Council.

7.11 Urban design, access and security

It is considered that there are no urban design or security issues arising from the proposal. The Council's Urban Design Officer has reviewed the scheme and raised no objections to the appearance of the building or materials proposed.

The Metropolitan Police have been consulted on the proposals and raised no objections to the details submitted subject to the development being covered by a Secured by Design condition.

7.12 Disabled access

There are 34 adaptable units proposed that would be Part M4(3) compliant, comprising 10% of the overall accommodation; all the other units are proposed to be Part M4(2) compliant. The Council's Access Officer has reviewed the proposed scheme and raised no objections subject to the attachment of relevant conditions to ensure that further details relating matters such as the proposed 'Home Zone', drop-off points, the proposed paving material and play equipment, plus a condition to secure M4(3) and M4(2) compliance. The Council's Access Officer has requested that 300 of the proposed units be constructed to M4(2) Accessible and Adaptable standard, 24 of the units for private sale be constructed to an M4(3) Wheelchair Adaptable standard and 9 of the affordable housing units be constructed to M4(3) Wheelchair Accessible standard. The applicant is proposing that 9 of the units would be wheelchair accessible however further details are recommended to be secured condition.

The above proposed conditions are recommended to be attached to any grant of planning consent.

Subject to the above the proposed scheme is considered to be in accordance with the London Plan 2016, Policy 3.8 (Housing Choice), 7.2 (Inclusive Environment), and the Council's Supplementary Planning Document 'Accessible Hillingdon', adopted September 2017.

7.13 Provision of affordable & special needs housing

The London Plan (March 2016) sets the policy framework for affordable housing delivery in London. Policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to their affordable housing targets. Policy 3.13 sets the threshold for seeking affordable housing as schemes with 10 or more units.

The development would introduce a total of 333 dwellings, thereby triggering the Mayor's affordable housing requirement threshold. 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's Planning Obligations Supplementary Planning Document (supplementary planning guidance) adopted in July 2014 states that the Council aims to achieve a tenure mix of 70% social rent and 30% intermediate housing across the Borough, however it notes at paragraph 4.16 that 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.

The proposed scheme will provide 99 affordable housing units, equating to a 35% provision by habitable room. The proposed affordable housing provision would contain a mix of one, two and three bedroom properties for Affordable Rent (27%), London Living Rent (35.6%) and Shared Ownership (37.4%). It is noted that this tenure does not fully accord with planning policy. As such the applicants have lodged a Financial Viability Appraisal which has been independently reviewed and confirms that only 19.1% affordable housing provision is deemed viable. Whilst this is a lower provision, the applicants have maintained their offer of 35% (by habitable room) at a non-policy compliant tenure mix.

The Council's Policy Team have confirmed that they have no objections to the affordable housing offer proposed. Taking the above matters into account, the affordable housing offer is considered to be justified and in accordance with Policy H2 of the Hillingdon Local Plan: Part 1- Strategic Policies. The details of the provision of affordable housing will be secured under the S106 Legal Agreement that will include an appropriate review mechanism.

It is noted that the Greater London Authority have requested that the affordable housing provision should be 50%, however this is based on policy contained within the proposed, and currently un-adopted, London Plan and as such these policies are not deemed to carry sufficient weight to warrant such a provision at this time.

7.14 Trees, landscaping and Ecology

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.

A tree survey has been submitted with the application that confirms that the few trees on the site are of low quality with no 'A' grade trees. Three (off-site) trees are 'B' grade, whose condition and value indicates that they should be retained as part of any new development. The other 15 trees are 'C' and 'U' grade trees which do not pose a constraint on development. It is noted that none of the off-site 'B' grade trees appear to be at direct (or indirect) risk from the proposals or construction related activities.

The Design & Access Statement provides a comprehensive landscape masterplan and conveys the intended landscape character. The landscape plan features five key landscape zones; Pump Lane frontage, Chalfont Square, Chalfont Road Home Zone, Woodland area and Podium Level Gardens (on the first floor). The proposals would result

in a significant improvement to the level of soft landscaping currently in situ along Pump Lane. The masterplan has been designed to provide well-landscaped boundaries, attractive through routes for pedestrians, lush swathes of planting and a semi-natural linear park. While a significant amount of planting is proposed at ground level (more sustainable), the first floor podium level garden extends over a substantial area and will be large enough to create a variety of attractive and accessible spaces for the occupants of the flats. A range of indicative surface treatments is illustrated under the hard landscape strategy, using permeable paving materials. Boundaries will be defined by (powder-coated) steel railings specified at 1.1metres and 1.8 metres in height. The soft landscape strategy has considered the required heights and form of planting which has guided the planting palette. 'Structure' planting includes the use of single and multi-stem trees and hedges, planted in a range of sizes. 60 small / young trees will be planted on the podium level and well over 100 trees (mixed sizes) will be planted throughout the site at ground level. Play spaces have been incorporated within the masterplan to accommodate doorstep play (for under 5's), local playable space (< 11 years), neighbourhood playable (<11+ years) and youth space (12 +). Trees have been selected and green walls incorporated into the scheme with a view to filtering airborne pollutants and improving local air quality. Subject to detail, the scheme will provide a significant net gain in green infrastructure and biodiversity.

The Landscape Strategy is considered to be well thought out and to represent a high quality of provision. The Council's Landscape Architect has been involved throughout the pre-application process and raises no objections to the application subject to conditions to secure further details of landscape specifications.

As such, the overall landscaping proposal is considered to be in accordance with the character of the surrounding area in accordance with Policy BE38 of the Hillingdon Local Plan.

7.15 Sustainable waste management

London Plan Policy 5.17 requires adequate provision to be made for refuse and recycling facilities for new development.

The Council's Waste Management Officer was consulted on the proposals and raised a concern regarding the proposed location of Block A's collection point on Pump Lane, the refuse provision for the third commercial unit and some of the proposed collection points. These concerns have been passed on to the applicant and an amended layout (plan ref. T20P00 Rev 1B) has now been proposed. The commercial units will have separate refuse storage areas to the residential elements and amended collection points are now proposed. The alternative arrangements have been reviewed by the Council's Waste Management Officer who has confirmed no objection subject to the attachment of appropriate condition requiring details of a Servicing and Refuse Collection Strategy.

The Council's Highways Engineer also raised a concern about the proposed pinch point at the priority junction and servicing layby at the access onto the site with Pump Lane. These concerns have also been passed on to the applicant and the amended arrangement has now been proposed (plan ref. T20P00 Rev 1B). The amended scheme has been reviewed by the Council's Highways Engineer who has confirmed that they accept the proposals subject to a condition requiring final details of traffic arrangements.

Subject to the above conditions the proposed scheme is now considered acceptable.

7.16 Renewable energy / Sustainability

Policy 5.3 of the London Plan requires development proposals to demonstrate sustainable design standards are integral to the proposal. It requires major development proposals to

meet minimum sustainable design standards set out in the Mayor's SPG. Policy 5.2 of the London Plan seeks to minimise carbon dioxide emissions and requires major residential developments to achieve a zero carbon standard. However if this cannot be achieved, then a cash in lieu contribution will be sought.

The submitted Energy Strategy demonstrates how the development will adopt sustainable design and construction techniques. An on-site Combined Heat and Power (CHP) system is proposed to be connected to a site-wide heating network to supply hot water and space heating to the entire development. The CHP and boiler plant together with all the associated ancillary equipment will be located on the ground floor next to Block G in the Energy Centre, to allow for the exit of flue gases at the highest point. The energy centre has a total floor area of circa 121m².

The renewable energy assessment shows that Photovoltaics (PV) systems can be provided to generate renewable power. The energy assessment indicates that circa 750m² of flat roof area (including access) is proposed for the PV panels on the unshaded flat roofs of Cores D, E, F and G.

However, overall the Energy Strategy does not demonstrate compliance with the London Plan (policy 5.2) through onsite measures to achieve zero carbon. The Energy Strategy demonstrates the proposal will only deliver the minimum requirements (35% onsite) reduction in CO₂ from a 2013 Building Regulation baseline. Therefore, the development does not achieve the necessary zero carbon standards and consequently requires a S106 offsite contribution as per Policy 5.2E of the London Plan. The shortfall amounts to 214 tCO₂ as set out on page 2 of the Energy Assessment (Low Energy Consultancy Ltd). This equates to 6420 tCO₂ over the 30 year period defined by the GLA as the period of a carbon intensive grid.

Whilst the GLA have raised a concern with the energy strategy in their Stage I response, the Council's Sustainability Officer has reviewed the application proposals and confirmed that they have no objections to the application subject to an offsite contribution. The proposal will only be policy compliant through an offsite contribution secured in the S106 - the contribution is £385,200.

In addition, The Council's Sustainability Officer has requested a condition regarding details of the proposed low (CHP) and zero carbon (PVs) technology to be used onsite to be submitted and approved in writing by the Local Planning Authority.

Subject to a Section 106 Legal Agreement securing the carbon off set contribution and the above condition, 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 UDPPolicies (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 Council's Flood and Water Management Officer assessed the submitted documentation and confirmed that the indicated strategy will control surface water run off from the 1.8ha site to 6ls for events up to and including the 1 in 100 year plus 40% climate change event, which is considered acceptable.

However it is not clear that the best solutions have been incorporated and has recommended a condition be attached requiring a scheme for the provision of sustainable water management.

In addition to the above the Council's Flood and Water Management Officer has raised a concern that the scheme includes proposals to provide drainage infrastructure within an area set aside a proposed extension of cycleways along Pump lane. The proposals for the site therefore need to be revised so that the drainage for the site is not within an area which will be disturbed later by cycleway/pedestrian works.

A contribution to improve the cycleway along Pump lane was requested by the Council's Flood and Water Management Officer, however given the £275,000 contribution already agreed they have confirmed that a further contribution is not required.

A concern has been raised about the proposed connection into the SW sewer and that a CCTV survey is required to be undertaken to provide evidence that the sewer is suitable to receive these flows. A maintenance plan is required to incorporate all elements of a drainage proposal including pipework and ability to respond to adhoc issues arising.

The Council's Flood and Water Management Officer has confirmed that these concerns can be resolved through appropriately worded conditions. These conditions are recommended to be attached to any grant of planning consent.

It is considered that sustainable drainage and water management issues can be addressed by the imposition of a suitably worded 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 2016 and the aspirations of the NPPF.

7.18 Noise or Air Quality Issues

NOISE

The National Planning Policy Framework (NPPF) provides the Government's guidance on noise issues and paragraph 182 states that planning decisions should ensure that new development can be integrated effectively with existing businesses and that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business could have a significant adverse effect on new development (including changes of use to residential) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed. 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.

The application site is adjacent to existing industrial uses to the south east and a Matalan commercial unit to the east on Pump Lane. The proposed residential units are in close proximity to these adjacent uses and the application is supported by a Noise Impact Assessment. In order to determine the extent to which the site is currently affected by noise, a detailed measurement study has been carried out. Measurements have been

carried out in order to characterise the existing noise climate during both the daytime and the night-time. The study revealed that the noise climate on the site was dominated by distant road traffic noise from the nearby A312 Parkway, with louder, regular pass-bys on Pump Lane, which included regular HGV movements. There were also regular aircraft passing overhead and plant noise from the light-industrial buildings close to site. It is noted in the report that there is existing rooftop plant, at first floor level, located at the rear of the industrial buildings on Silverdale Road, approximately 11m from the rear site boundary.

The results of the initial site risk assessment based on the measured noise levels indicate that the site has a medium risk in terms of noise. A Medium level of risk is described as: 'As noise levels increase, the site is likely to be less suitable from a noise perspective and any subsequent application may be refused unless a good acoustic design process is followed and is demonstrated in an Acoustic Design Statement (ADS) which confirms how the adverse impacts of noise will be mitigated and minimised, and which clearly demonstrate that a significant adverse noise impact will be avoided in the finished development.'

Good acoustic design has been shown in the layout of the proposed development in that all ground floor flats are set back from Pump Lane, the majority behind the commercial units. Most flats across the development will benefit from shielding from Pump Lane from the intervening buildings. Additionally, the proposed layout limits the number of balconies overlooking Pump Lane and podium level shared amenity spaces have been provided for the development at first floor level and will be shielded from noise from Pump Lane by the massing of the intervening buildings. A significant section of landscaping is also proposed to the south east of the site between Blocks H and J and the existing industrial uses.

Internal noise levels should ideally be achieved in as many properties as possible with windows open. Due to the relatively high noise levels present at site, not all habitable rooms will be able to achieve the requirement with windows open, and therefore the sound insulation of the building will be required to mitigate noise levels. The report concludes that double glazing should be utilised and that for those elevations which overlook Pump Lane and the existing industrial uses appropriately specified acoustic trickle vents will be installed to allow adequate ventilation without the requirement to open windows.

The Council's Environmental Protection Unit have requested a series of conditions to control both internal, external and plant noise. These conditions are recommended to be attached to any grant of planning consent. In addition a condition is recommended to be attached that limits the hours of use of the proposed commercial units. Subject to these conditions being attached it is considered that the scheme would be acceptable in terms of noise.

AIR QUALITY

The development proposal is for 333 residential units and commercial floorspace. The location is within an Air Quality Focus Area as defined by the GLA (Focus Area 85, Hayes Town Botwell Lane/Pump Lane) and included within the Hillingdon Hayes Focus Area. Focus Areas are defined as areas where the air quality limits are exceeded, there is relevant public exposure and actions should be prioritised to achieve significant improvements in air quality. The development is introducing sensitive receptors into a poor air quality area. In order to secure improvements to air quality, Policy 5.2 of the London Plan seeks a reduction in CO2 emissions. Policy 7.14 of the London Plan and Policy EM8 of the Local Plan Part 1 require development to be at least 'air quality neutral' and where appropriate, contribute towards the promotion of sustainable transport modes such as

vehicle charging points.

The Council's Air Quality Officer has reviewed the proposals and confirmed that to understand the level of improvements required, a NOx damage cost has been applied to the development. The air quality assessment calculates this as £401, 677 which is agreed.

The quantifiable reductions from specific mitigation measures on-site have also been agreed, namely full and effective implementation of a targeted Travel Plan and a bespoke air quality positive green infrastructure plan. The mitigation in terms of damage costs reductions has been agreed with the Council and calculated at £95,007.

This leaves a quantified damage cost of £306,670 which requires to be addressed i.e. efforts should be made to reduce emissions further.

In terms of achieving further air quality mitigation, the following schemes are supported as measures which if secured and implemented via a s106 obligation could actively contribute to improving the use of sustainable modes of travel:

- Funding of works required to link the development to the town centre thereby reducing future occupiers reliance on the private car
- Contribution towards improvements to the canal towpath to provide future cyclists and pedestrians with direct car free route between Hayes and Harlington and West Drayton stations
- Implementation of the Healthy Streets approach in Hayes

The above improvement works and the requisite contributions have been confirmed and agreed with the developer, in addition to the set back of the development from Pump Lane to enable future bus or cycle way service and the TfL bus contribution of £25,000.

The Council's Air Quality Officer has confirmed that the remainder of the damage costs for air quality have, therefore, been incorporated within the traffic management purposes and no further contributions are required. As such the development is considered to accord with Policy 5.2 and Policy 7.14 of the London Plan (2016) and Policy EM8 of the Local Plan Part 1.

7.19 Comments on Public Consultations

Consultation letters were sent to 198 local owner/occupiers on 18/12/18. The application was also advertised by way of site and press notices. The following responses have been received:

- 1 petition in objection to the proposals
- 18 comments in objection
- 12 comments in support

Concerns raised regarding the principle of development, loss of daylight and sunlight, privacy, transport, design, density, security, residential amenity, air pollution, sustainability, trees and services are covered within the relevant sections of this report. Concerns raised that are not material planning considerations, such as impact on property values and vermin within existing buildings, cannot be considered. The comments in support of the proposals are noted.

7.20 Planning obligations

Policy R17 of the Hillingdon Local Plan: Saved 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.

Should the application be approved, a range of planning obligations would be sought to mitigate the impact of the development, in line with saved policy R17 of the of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012).

The obligations sought are as follows:

1. On-site Affordable Housing (including review mechanism)
2. Pedestrian and Cycle improvements contribution of £250,000
3. Grand Union Canal Quiet Way contribution of £50,000
4. Healthy Streets contribution of £25,000
5. Local Bus Services contribution of £25,000 each year for three years
6. Carbon off-set contribution of £385,200
7. Residential Travel Plan plus £20,000 bond
8. Commercial Travel Plan plus £20,000 bond
9. Car Club provision of two spaces
10. Parking permits restriction for future occupiers
11. Construction Training: A financial contribution to the sum of: Training costs: £2500 per £1m build cost plus Coordinator Costs - up to £9,600 per phase or an in kind scheme to be provided
12. Highway Works: S278/S38 for required Highways Works
13. Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions

In addition to S106 contributions the Council has adopted its own Community Infrastructure Levy (CIL) with a charge of £95 per square metre of gross internal residential floor area and £35 per square metre of gross internal office floor area. This application is CIL liable with respect to new floorspace being created, and the sum calculated for this application based on the floor area proposed is £2,511,162.58 (residential) and £0 if the commercial space is used for offices (do to the demolition of existing buildings on the site).

It should be noted that there is no Hillingdon CIL charge for the commercial unit if it is utilised as A1 Use as it is below 1,000 sqm. There is also no Hillingdon CIL charge for A2 - A5 Uses.

In addition to the London Borough of Hillingdon CIL, the Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £60 per square metre (as of the 1st of April 2019) of gross internal floor area to be paid to the GLA to go towards the funding of Crossrail. This application is CIL liable with respect to new floorspace being created, and the sum calculated for this application based on the floor area proposed is £1,685,542.59.

7.21 Expediency of enforcement action

No enforcement action is required in relation to this application.

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

The application proposes the mixed use redevelopment of Chailey Industrial Estate to provide three buildings ranging from 2 to 11 storeys in height delivering 333 residential units and 710 sq.m of ground floor commercial floorspace (Use Classes A1, A2, A3, B1, D1 or D2), including the provision of private and communal amenity areas, child play space, car parking, secure cycle parking, refuse storage areas and other associated development.

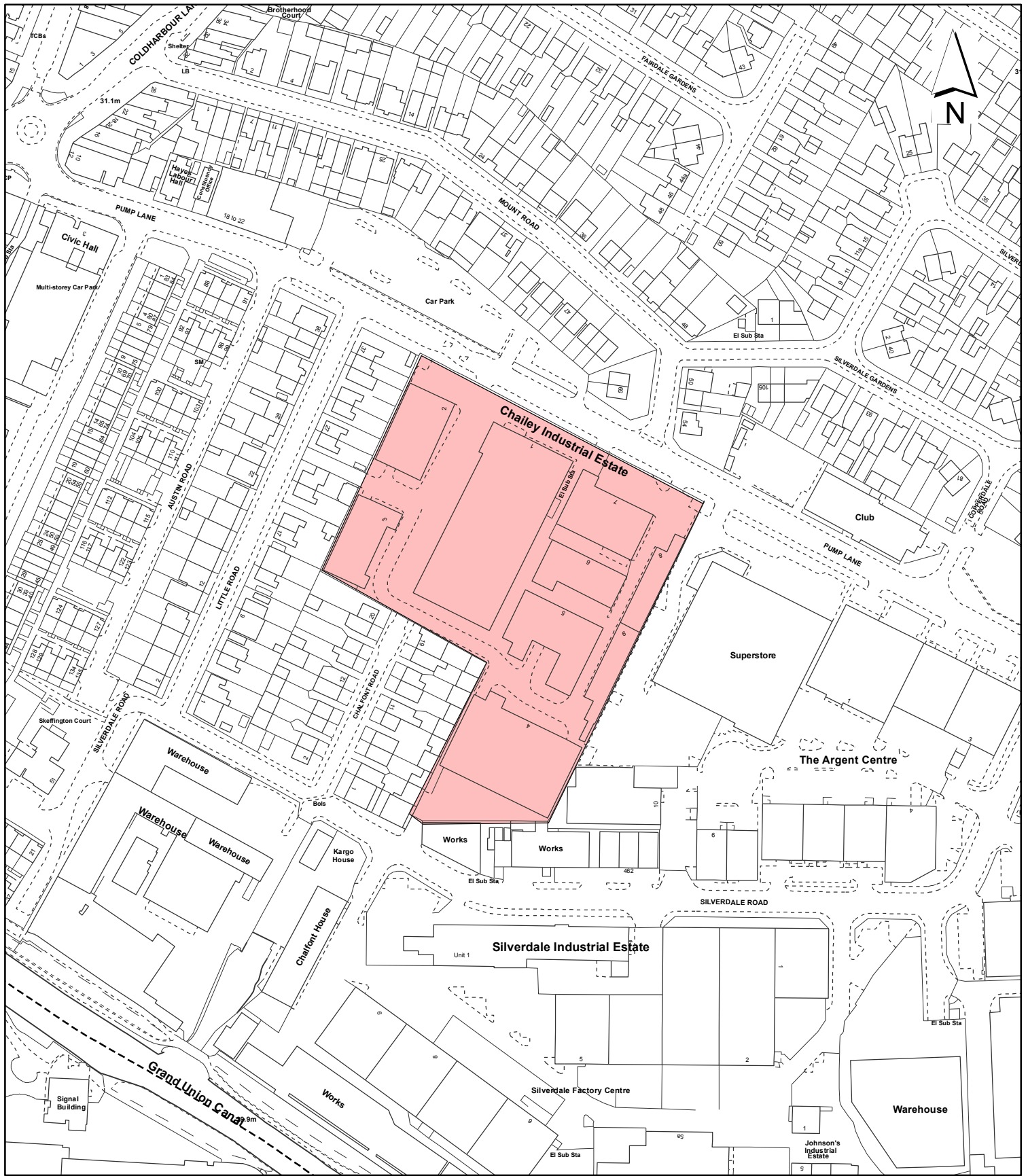
The proposed development is considered an appropriate mix of uses, scale and built form that is well designed and will enhance the locality. The provision of additional residential units to the local area is supported by local policy and the London Plan (2016). Subject to a S106 legal agreement and appropriate conditions the application is therefore recommended for approval.

11. Reference Documents

The Hillingdon Local Plan: Part 1- Strategic Policies (November 2012)
Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)
London Plan 2016
National Planning Policy Framework (NPPF) 2018
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
Council's Supplementary Planning Document - Noise
Hillingdon Supplementary Planning Document: Accessible Hillingdon January (2010)
GLA Affordable Housing and Viability Supplementary Planning Guidance (SPG)
Emerging Hillingdon Local Plan: Part 2 Site Allocations and Designations
Emerging Hillingdon Local Plan: Part 2 Development Management Policies
Emerging Hillingdon Local Plan: Part 2 Policies Map

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Notes:

 Site boundary

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Site Address:

**Chailey Industrial Estate
 Pump Lane
 Hayes**

**LONDON BOROUGH
 OF HILLINGDON**
 Residents Services
 Planning Section
 Civic Centre, Uxbridge, Middx. UB8 1UW
 Telephone No.: Uxbridge 250111

Planning Application Ref:

2102/APP/2018/4231

Scale:

1:2,250

Planning Committee:

Major

Date:

April 2019



HILLINGDON
 LONDON