

Report of the Head of Planning, Transportation and Regeneration

Address FORMER SEA CADETS SITE WATERSPLASH LANE HAYES

Development: Erection of 2 x 3 bedroom houses, construction of a 28 space public car park, widening and improvements of the existing access road, improvements to the existing access to Cranford Park, provision of a new children's play area and all associated external works (involving the demolition of the existing single storey building and removal of all storage units) (Additional lighting details)

LBH Ref Nos: 15604/APP/2020/283

Drawing Nos: 1300-001 Rev. A Lighting proposals
2020/D/298/P/04
2020/D/298/P/01 B
2020/D/298/P/02 B
2020/D/298/P/03 C
2020/D/298/P/05
2020/D/298/P/06
2020/D/298/P/07
Design and Access Statement
Planning Statement

Date Plans Received:	27/01/2020	Date(s) of Amendment(s):	03/08/2020
Date Application Valid:	27/01/2020		16/10/2020
			13/08/2020

DEFERRED ON 25th July 2020 FOR FURTHER INFORMATION .

This item was deferred from a previous Major Applications Planning Committee held on 15 September 2020, to enable comments to be sought from the Metropolitan Police Crime Prevention Officer on security measures, and for a lighting scheme be provided, as this site has a history of anti social behaviour.

Following consultation with the Secure By Design Officer, the following amendments have been made to the plans:

- 1) A gate has been provided at the entrance to the car park, which is to be kept locked during hours of darkness. The location is shown on the revised site plan. Details of the gate, including hours of closure to be conditioned.
- 2) The residential parking bays have been re- positioned in the two most north eastern parking spaces (outside the houses) this will mean there is informal surveillance from the houses over their cars. However a secondary gate is required to protect these two houses and now forms part of the proposals.
- 3) A line of security fencing between the houses and car park in the form of a 2.4m high fence is proposed and the final details will be secured by condition in respect of the fence and additional soft landscaping
- 4) The two gates proposed as shown on the plans will be security rated (LPS1175/Issue 7 SR1) and the primary gate during the hours of darkness is to be locked. The gates need to have a fob to control them so that the two residential properties will have the ability to open the gates from the homes to allow visitors access. The secondary gate would be just for the two residences, again a fob and intercom system will be used in this location.

- 5) the site shall achieve Secure By Design Accreditation; a condition will be imposed to secure this for the properties and the car park must achieve Park Mark standard;
- 6) A lighting scheme has now been submitted which includes improved street lighting along Watersplash Lane as well as external lighting for the proposed public car park and onward entrance to Cranford Park. The lighting scheme has been designed to address security issues together with highway safety, whilst respecting the Green Belt status of the site, as well as ecological considerations. The external lighting scheme will be implemented before the development is brought into use/occupied and this is secured by condition.

The Secure By Design Officer has formally advised that no objections are raised to the revised plans subject to the imposition of conditions.

It is considered that should these crime prevention measure be adopted, the scheme will promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 and ensure the development provides a safe and secure environment, in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

Accordingly, the application is recommended for APPROVAL.

1. SUMMARY

Planning permission is sought for the construction of a public car park, comprising 28 parking spaces for the benefit of visitors to Cranford Park and the erection of two, semi-detached houses, with gardens and parking spaces. Soft landscaping within the site and a tree belt around its perimeter would also be introduced. Watersplash Lane itself would be widened and drainage introduced. The entrance to Cranford Park would be improved, with a new children's play area provided inside the park, close to the northern entrance.

The proposals would involve the demolition of the existing single storey brick clad, modular building and the removal of all the storage units within the site.

The site is within the Green Belt. Notwithstanding the fact that most of the site is previously developed and the works would not increase the developed area of the site, it is considered that cumulatively, the proposed development would have a slightly greater impact on the openness of the Green Belt in this location, On balance it is therefore considered that the proposal as a whole constitutes inappropriate development. The applicant has therefore set out 'very special circumstances' to justify such development. These include:

- Reduction in hard surfacing
- The application site would return to beneficial uses, much of it accessible to the public
- The building of the two houses would provide natural surveillance, ending the site's seclusion, which in turn will help deter the site's long history of anti-social behaviour
- The public car park would be of great benefit to the visitors to Cranford Park
- The proposed woodland tree planting around the site would improve the air quality in this Air Quality Focus Area.
- The widening of Watersplash Lane, necessary for the car park, would greatly benefit the park by opening up views of the park's entrance.
- The development would enable the construction of a children's playground (314 square metres) at the northern end of the park, and this would be of community benefit to the families moving into the many new residential blocks in the area.

Officers consider that the benefits, when weighed against the drawbacks of the proposed

development are significant and therefore very special circumstances weighing in favour of the proposal exist in the case of the proposed development.

The proposal would provide two new dwellings with acceptable levels of internal floorspace and external amenity space. Sufficient parking would be provided for the development. The scale and design of the proposed houses would be in keeping with the character and appearance of the immediate street scene.

The development would not impact on highway and pedestrian safety.

Approval is therefore recommended subject to legal agreement/s and conditions.

2. RECOMMENDATION

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

A. That the Council enter into a Statement of Intent/Legal Agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) and/or Section 278 of the Highways Act 1980 (as amended) or other appropriate legislation to secure the following:

(i) Transport: The applicant shall agree to the full and complete costs to undertake the necessary works, as identified by the Council, for on site and off site highways works as a result of this proposal including:

a) Improvements to the junction of Watersplash Lane and North Hyde Road

b) Traffic management measures to be implemented on Watersplash Lane, comprising widening of the carriageway, provision of pedestrian footways, street lighting improvements, waiting restrictions, reconstruction of kerbing on both sides of Watersplash Lane and road signage.

ii) Off site landscape and ecological enhancements on land to the north and east of the application site

iii) The applicants pay a sum to the Council equivalent to 2% of the value of contributions for compliance, administration and monitoring of the completed planning (and/or highways) agreement(s).

(iv) Car Park and Play Area to remain publicly accessible at all times

(v) The applicants pay a sum to the Council of 3% of the value of contributions for specified requirements to project manage and oversee implementation of elements of the completed planning (and/or highways) agreement(s).

B. That in respect of the application for planning permission, the applicant/purchaser of the Council's interest in the land meets the Council's reasonable costs in the preparation of the S106/278 Agreements and any abortive work as a result of the agreements not being completed.

C. If the S106 Agreement/Statement of Intent has not been finalised within 12 months, the application is to be referred back to the Planning Committee for determination at the discretion of the Head of Planning, Transportation and Regeneration.

D. That officers be authorised to negotiate and agree the detailed terms of the proposed agreements.

E. That subject to the above, the application be deferred for determination by the Head of Planning, Transportation and Regeneration under delegated powers.

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

1 RES3 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 RES4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans,

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and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and the London Plan (2016).

3 HO4 Materials

No development shall take place until details and/or samples of all materials and finishes to be used on all external surfaces have been submitted to and approved in writing by the Local Planning Authority in consultation with the Secure By Design Officer. Thereafter the development shall be constructed in accordance with the approved details and be retained as such. Details should include information relating to:

(i) fenestration and doors

(ii) fencing

(iv) comprehensive colour scheme for all built details

(v) make, product/type, colour and photographs/images

(vi) bricks and roof finishes

(vii) bin Stores

REASON

To safeguard the visual amenities of the area and to ensure that the proposed development does not have an adverse effect upon the appearance of the existing building in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

4 RES8 Tree Protection

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

1. A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.

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

Thereafter, the development shall be implemented in accordance with the approved details.

The fencing shall be retained in position until development is completed.

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

2.a There shall be no changes in ground levels;

2.b No materials or plant shall be stored;

2.c No buildings or temporary buildings shall be erected or stationed.

2.d No materials or waste shall be burnt; and.

2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

3. Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections/meetings shall be submitted to the Local Planning Authority.

REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with Policy DMHB 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

5 RES9 Landscaping (car parking & refuse/cycle storage)

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

1. Details of Soft Landscaping

1.a Planting plans (at not less than a scale of 1:100),

1.b Written specification of planting and cultivation works to be undertaken,

1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping

2.a Refuse Storage

2.b Cycle Storage for park visitors comprising 6 spaces;

2.c Means of enclosure/boundary treatments

2.d Car Parking Layouts (4 spaces for the residential units and 28 spaces for Cranford Park, including 4 disabled bays)

2.e Hard Surfacing Materials

2.f Children's play equipment

3. Schedule for Implementation

4. Other

4.a Proposed finishing levels or contours

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

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with Policies DMHB 11, DMHB 14 and DMT6 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and Policy 5.17 (refuse storage) of the London Plan (2016).

6 RES10 Tree to be retained

Trees, hedges and shrubs shown to be retained on the approved plan(s) shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during (or after) construction, or is found to be seriously diseased or dying, another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'

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

REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with Policy DMHB 14 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

7 HO10 Front Garden Landscaping

Notwithstanding the details hereby approved a minimum of 25% of the front garden area shall be soft landscaped (eg. grass or planted beds) for so long as the development remains in existence.

REASON

To ensure the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with Policies DMHB 11, DMHB 14 and DMT6 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) and Policy 5.17 of the London Plan (2016).

8 RES12 No additional windows or doors

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development)(England)Order 2015 (or any order revoking and re-enacting that Order with or without modification), no additional windows, doors or other openings shall be constructed in the walls or roof slopes of the development hereby approved.

REASON

To prevent overlooking to adjoining properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

9 RES14 Outbuildings, extensions and roof alterations

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development)(England) Order 2015 (or any order revoking and re-enacting that Order with or without modification); no garage(s), shed(s) or other outbuilding(s), nor extension or roof alteration to any dwellinghouse(s) shall be erected without the grant of further specific permission from the Local Planning Authority.

REASON

To protect the character and appearance of the area and amenity of residential occupiers in accordance with Policies DMHB 11, DMHB 18 and DMHD 1 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

10 NONSC Non Standard Condition

The dwellings hereby approved shall be constructed to meet the standards for a 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 buildings.

REASON

To ensure that an appropriate standard of housing stock, in accordance with London Plan policy 3.8(c) is achieved and maintained.

11 NONSC Non Standard Condition

Prior to occupation, details of safe access to secure and stimulating play and recreational areas for all children and young people, including the provision of equipment for disabled children with complex or multiple disabilities, shall be submitted to, and approved in writing, by the Local Planning Authority. All such provisions shall remain in place for the life of the development.

REASON

To ensure that suitable play and recreation facilities are provided in accordance with London Plan policy 3.6.

12 NONSC Non Standard Condition

Prior to works commencing above damp proof course level, details of step free access via the principal private entrances of the dwellings hereby approved shall be submitted to, and approved in writing, by the Local Planning Authority. Such provision shall remain in place for the life of the building/s.

REASON

To ensure that an appropriate standard of housing stock, in accordance with London Plan policy 3.8(c), is achieved and maintained.

13 NONSC Non Standard Condition

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. Where appropriate, details of a programme for delivering related positive public benefits

C. 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

To comply with Policy BE1 (2012) - Built Environment, of the Hillingdon Local Plan Part 1 and Policy DMHB 11 Local Plan: Part Two - Development Management Policies (2020).

14 NONSC Non Standard Condition

All soils used for gardens and/or landscaping purposes shall be clean and free of contamination. Site derived soils and imported soils shall be tested for chemical contamination, and the results of this testing shall be submitted for approval to 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 DME1 13 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020).

15 RES15 Sustainable Water Management (changed from SUDS)

No development approved by this permission (excluding site clearance and demolition) shall be commenced until a plan (provided in CAD as well as PDF) for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. As a minimum, the plan shall show the following details:

i. Identify areas of hardstanding, state the material to be used for each area and show the proposed levels and direction of slope. All hard standing areas shall be formed of permeable surfaces, or slope to a permeable area. ii. Identify proposed downpipes from the development and show where these will discharge to.

iii Utilise SuDS such as rain gardens, soakaways or other infiltration techniques.

iv. The development should also use methods to minimise the use of potable water through the use of rainwater harvesting measures (such as water butts) to capture excess rainwater. Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

REASON

1. To ensure that surface water run off is controlled and to ensure the development does not increase the risk of flooding in accordance with: Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012); Policy DMEI 10 Water Management, Efficiency and Quality of the Hillingdon Local Plan Part 2 Development Management Policies; Policy 5.12 Flood Risk Management of the London Plan (March 2016);

2. To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016); Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016); National Planning Policy Framework (February 2019); and the, Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

16 COM30 Contaminated Land

(i) The development hereby permitted shall not commence until a scheme to deal with contamination has been submitted 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 policies DMEI 11 and DMEI 12 Hillingdon Local Plan Part 2 (2020).

17 RES13 Obscure Glazing

The windows within all flank/side elevations shall be glazed with permanently obscured glass to at least scale 4 on the Pilkington scale and be non-opening below a height of 1.8 metres taken from internal finished floor level for so long as the development remains in existence.

REASON

To prevent overlooking to adjoining properties in accordance with policies DMHB 11 and DMHD 1-2 of the Hillingdon Local Plan Part 2 (2020).

18 COM27 Traffic Arrangements - submission of details

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

REASON

To ensure pedestrian and vehicular safety and convenience and to ensure adequate off-street parking, and loading facilities in compliance with policies DMT 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Chapter 6 of the London Plan (2016).

19 COM31 Secured by Design

The development 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 excising 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 ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

20 NONSC Park Mark Award

The car park shall achieve a Park Mark award from the British Parking association. The car park shall not be brought into use 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 excising 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 ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

21 NONSC Non Standard Condition

The proposed car park gates shall be security rated (LPS1175/Issue 7 SR1). The primary main entrance gate shall be locked during the hours of darkness. The secondary gate would be just for the two residences. Both gates shall incorporate a fob to control and intercom for the benefit of the two residential properties.

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 ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

22 COM29 No floodlighting

The proposed external lighting scheme ref: 1300-001Rev. A shall be implemented on or before the development hereby approved is occupied or brought into use. No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been approved in writing by the Local Planning Authority in consultation with the Secure By Design Officer. Any lighting that is so installed shall not thereafter be altered other than for routine maintenance which does not change its details

REASON

In pursuance of the Council's powers under section 2 of the Local Government Act 2000 and ensure the development provides a safe and secure environment, in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3; to safeguard the amenity of surrounding properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020); and to protect the ecological value of the area in accordance with Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020).

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 Local Plan 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.

DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 18	Private Outdoor Amenity Space
DMHD 1	Alterations and Extensions to Residential Dwellings
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMCI 2	New Community Infrastructure
DMCI 3	Public Open Space Provision
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 14	Air Quality

DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 17	Residential Density
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 5	Pedestrians and Cyclists
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.8	(2016) Housing Choice
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment

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 Local Plan Part 1, Local Plan Part 2, 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.

4 115 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.

5

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

The 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 you do not agree to this pre-commencement condition please explain your reasons and any alternatives suggested. Without this pre-commencement condition being imposed, the application would be refused as it would not comply with NPPF paragraph 199.

The archaeological fieldwork should comprise the following:

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 (predetermination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Evaluation trenches should be excavated across the area affected by groundworks as stage 1 of the condition with further investigation in stage 2 if necessary.

You can find more information on archaeology and planning in Greater London on our website

3. CONSIDERATIONS

3.1 Site and Locality

The application site is part of a large, Council owned tract of land in the Green Belt, bordered by North Hyde Road to the north, the back gardens of the terrace fronting Watersplash Lane to the west, Watersplash Lane and Cranford Park to the south and the River Crane and its floodplain to the east.

The application site comprises the remains of a large brick building, of some 201 square metres, originally used by a sea cadet group, though vacated at least ten years ago. Around the building, to east and south is a large area of concrete hard standing, once used for car parking. The northern part of the site is open, except for a rectangular concrete plinth of 41 sq. metres, and a group of trees fronting North Hyde Road. The entrance to the site is in Watersplash Lane, a narrow, single track road leading from North Hyde Road around a blind bend to the Cranford Park entrance and this site. From this point it narrows to form a footpath towards River Crane and running close to the river.

The whole of the site falls within the Green Belt and the eastern portion of the site, adjoining the River Crane but outside the application site boundary, is in the Flood Zone. The site is also within an Archaeological Priority Area.

3.2 Proposed Scheme

The application seeks permission for the erection of two, semi-detached houses, with

gardens and parking spaces, and the construction of a public car park, comprising 28 parking spaces (4 being disabled bays) for the benefit of visitors to Cranford Park. Soft landscaping within the site and a tree belt around its perimeter would also be introduced. Watersplash Lane itself would be widened and drainage introduced. The entrance to Cranford Park would be improved, a new children's play area built inside the park, close to the northern entrance.

The proposals for the Application Site would involve the demolition of the existing single storey, brick clad, modular building and the removal of all the storage units within the site.

3.3 Relevant Planning History

Comment on Relevant Planning History

There have been multiple reports of anti social behaviour in this area, covering issues such as fly tipping and community and neighbourhood nuisance. There have also been a number of unauthorised encampments at the location, as well as reports of drug dealing. These have been ongoing for a number of years, with the fly tipping being of high volume in recent months. The situation has been exacerbated by the long awaited redevelopment of the derelict Crane P.H. and the relative isolation and seclusion of this part of Watersplash Lane.

By 2013 the building was being squatted by a biker group called the Road Rats and Legal Services subsequently commenced proceedings for the recovery of the site. Since 2017, the site has been used for storage, on a temporary basis, by a Council contractor. Storage units have been erected.

4. Planning Policies and Standards

Development Plan

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

1.2 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 - Development Management Policies (2020)

The Local Plan: Part 2 - Site Allocations and Designations (2020)

The West London Waste Plan (2015)

The London Plan - Consolidated With Alterations (2016)

Material Considerations

1.3 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 Planning Policies

1.4 Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states 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).

Draft London Plan (Intend to Publish Version, December 2019)

1.5 The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October.

1.6 The Mayor has considered the Inspectors' recommendations and, on the 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept.

1.7 Limited weight should be attached to draft London Plan policies that have not been accepted by the Mayor or that have only been accepted in part/with significant amendments. Greater weight may be attached to policies that were subject to the Inspector's recommendations and have since been accepted by the Mayor through the Intend to Publish version of the Plan. Greater weight may also be attached to policies, which have been found acceptable by the Panel (either expressly or by no comment being made).

UDP / LDF Designation and London Plan

The following Local Plan 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.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM4 (2012) Open Space and Informal Recreation
- PT1.EM6 (2012) Flood Risk Management
- 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:

- DMHB 11 Design of New Development
- DMHB 14 Trees and Landscaping
- DMHB 18 Private Outdoor Amenity Space
- DMHD 1 Alterations and Extensions to Residential Dwellings

DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMCI 2	New Community Infrastructure
DMCI 3	Public Open Space Provision
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 14	Air Quality
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 17	Residential Density
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 5	Pedestrians and Cyclists
LPP 3.5	(2016) Quality and design of housing developments
LPP 3.8	(2016) Housing Choice
NPPF- 13	NPPF-13 2018 - Protecting Green Belt land
NPPF- 16	NPPF-16 2018 - Conserving & enhancing the historic environment

5. Advertisement and Site Notice

- 5.1** Advertisement Expiry Date:- Not applicable
- 5.2** Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

Consultation letters were sent to 6 neighboring local owners/occupiers and 3 responses have been received stating:

- > Complaints over existing activities on the site
- > Not happy with existing parking restrictions on Watersplash Lane.
- > Wish to remove a tree on Watersplash Lane.
- > Concerns over noise.

HISTORIC ENGLAND (GLAAS)

Thank you for your consultation on the amended scheme received on 13/08/20.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. NPPF Section 16 and the Draft London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and 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.

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.

As noted in my letter of 14/02/20 this application lies in an area of archaeological potential where remains of prehistoric or medieval date might be found.

I have looked at the revised 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 reduced impact of the amended development, and the likely modern disturbance 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.

NPPF paragraphs 185 and 192 and Draft London Plan PolicyHC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

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. Where appropriate, details of a programme for delivering related positive public benefits

C. 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 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:

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 (predetermination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Evaluation trenches should be excavated across the area affected by groundworks as stage 1 of the condition with further investigation in stage 2 if necessary.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations.

MET POLICE CRIME PREVENTION OFFICER

The two houses from a crime and security perspective are far from ideal, being accessed off of the car park leaves them with little natural surveillance and activity around them in the evenings. Furthermore the sharing of one area for residential use and a public car park gives the high chance of complaints and calls to police and a poorer quality of life for the perspective residents as issues that occur routinely in car parks that usually go unreported as they are not usually overly impact upon people lives such as groups of youths loitering, people driving here to eat takeaway, littering, listening to music, making phone calls , smoking, etc and I fear the layout creates a high chance of police and council services being called to this site to deal with anti social behaviour issues which will be impossible to prevent once build.

The proposal of moving the two residents car park spaces leaves them very vulnerable owing to no natural overlooking from either the houses they belong to or any neighbour, by putting in access to the rear gardens associated with this idea increases the vulnerability to burglary for these homes and also the existing neighbouring properties there rear perimeters would be exposed.

If the site is to be used for a public car park and housing I would encourage the design to keep the two completely separate, however if this is not possible and the proposed design is to be granted permission with then I recommend that the following features are designed in to make it as resilient as possible within this design to crime:

- Car park to be gated at its entrance (as close as possible to the road) the car park to be locked at night
- The residential parking bays to be positioned in the two most north eastern parking spaces (outside the houses) this will mean there is informal surveillance from the houses over their cars. However a secondary gate is required to protected these two houses.
- A line of security between the houses and car park in the form of a 2.4m high fence (if closed board wooden fencing can be 2.1m+30cm trellis)if the building line forms part of the security line between the houses and the car park please ensure appropriate defensive planting (mature at the time of completion) is planted along the building to prevent graffiti, and to protect windows from potential burglars.

- The two gates should be security rated (LPS1175/Issue 7 SR1) the primary gate can be left open during the day but during the hours of darkness the car park needs to be locked, but the gates need to have a fob to control them that the two residents will have, and an intercom with the ability to open the gates from the homes will be needed so that they can allow visitors access. The secondary gate would be just for the two residences, again a fob and intercom required.

I am happy to discuss this further and happy to review alternations to the proposal.

If Hillingdon planning department do grant planning permission to this application or any similar ones to this, I would strongly recommend the conditions that Secured By Design accreditation is met (to ensure physical security measures that are installed are appropriate for the site) and the car park must achieve a Park Mark award from the British Parking association upon its completion. This will ensure that the minimum level of crime prevention measures are installed which appropriate for the threat of crime and anti-social behaviour that this site will be subjected to in this area.

6/10/2020

Looking at the revised plans, I can confirm that the features I recommended are included, so I do not formally object. However my original comments still stand and the sharing of this land between a public car park and private housing is far from ideal but within proposals shown to myself this is as safe a design as possible.

Please provide my details to the applicant so I can assist them in achieving the SBD and Park Mark planning conditions if planning permission is granted.

In terms of lighting - owing to the concern I have on this site, I will look for lighting design that is signed off by a lighting engineer who holds a level 3 or 4 membership of the Institute of Lighting Professionals (ILP).

Of note this is contained within the SBD guide, so what I would be looking for is proof of the qualifications of the individual taking responsibility for the design and proof of their endorsement of the lighting design.

In terms of compliance I would need this before issuing of the SBD accreditation.

Internal Consultees

ACCESS OFFICER

Any grant of planning permission should include the following conditions:

Prior to works commencing, details of step free access via the principal private entrances shall be submitted to, and approved in writing, by the Local Planning Authority. Such provision shall remain in place for the life of the building.

REASON

To ensure that an appropriate standard of housing stock, in accordance with London Plan policy 3.8(c), is achieved and maintained.

The dwellings hereby approved shall be constructed to meet the standards for a 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/s.

REASON:

To ensure that an appropriate standard of housing stock, in accordance with London Plan policy 3.8(c), is achieved and maintained.

Prior to occupation, details of safe access to secure and stimulating play and recreational areas for all children and young people, including the provision of equipment for disabled children with complex or multiple disabilities, shall be submitted to, and approved in writing, by the Local Planning Authority. All such provisions shall remain in place for the life of the development.

REASON: to ensure that suitable play and recreation facilities are provided in accordance with London Plan Policy 3.6.

HIGHWAY ENGINEER

Proposals comprise the construction of 2 x 3-bedroom houses as well as the construction of a 31 space public car park.

Whilst I have no principle objections to the proposals, I would request that the developer enters into a S106 legal agreement which obliges the developer to enter into a S278 with London Borough Hillingdon under Highways Act 1980 thereby allowing such works to be carried out. The implementation of these works would be subject to the receipt and subsequent approval of detailed designs.

TREE AND LANDSCAPE OFFICER

This site is occupied by a sea cadets hut situated within a yard to the south of North Hyde Road and to the rear of the houses off Watersplash Lane. The yard is scruffy with a mixed of areas of concrete and gravel hard-standing and unmanaged grassland. The site has informal belts of trees / unmanaged hedgerows along the north, south and east boundaries. Access to the site is in the south-west corner adjacent to the footpath access to the River Crane and Cranford Park. There are no TPO's or Conservation Area designations affecting the site.

COMMENT: No trees will be directly affected by the proposals, however, protective fencing should be erected prior to the commencement of work to safeguard the surrounding trees and hedgerows. The paved area in front of the houses appears to be excessive, notably in front of plot 2.
- The two parking spaces provided to the side of the house could be located in front of the dwelling, thereby reducing the area of hardstanding and providing the opportunity for additional front garden / soft landscape infrastructure. Subject to this detail and landscape conditions, the scheme is acceptable.

RECOMMENDATION: No objection subject to the minor amendment to the parking (domestic) layout, pre-commencement condition RES8 and conditions RES9 (parts 1, 2, 4 and 5) and RES10.

(Officer note: The scheme has been amended and conditions imposed).

FLOOD AND DRAINAGE OFFICER

The site lies outside the floodplain of the River Crane and therefore no Flood Risk Assessment is required. The site is part of a brownfield site along the river corridor and has opportunity to improve the biodiversity and enhance the Park entrance. However Watersplash lane has no formal drainage and no Thames Water sewer for the site to connect to. This proposal will increase the usage of the

site and the Park entrance and so appropriate sustainable drainage design will need to be incorporated across the access and within the two properties and parking areas. There is significant opportunity to integrate the drainage with landscaping proposals to improve biodiversity within the area by providing rain gardens at the park entrance, and the grassed area to the north or the car parking to receive flows from the hard surfaced area. Therefore further detail is required to ensure that the most appropriate sustainable option is chosen and this does not increase the risk to the area.

No development approved by this permission (excluding site clearance and demolition) shall be commenced until a plan (provided in CAD as well as PDF) for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. As a minimum, the plan shall show the following details: i. Identify areas of hardstanding, state the material to be used for each area and show the proposed levels and direction of slope. All hard standing areas shall be formed of permeable surfaces, or slope to a permeable area. ii. Identify proposed downpipes from the development and show where these will discharge to. iii Utilise SuDS such as rain gardens, soakaways or other infiltration techniques. iv. The development should also use methods to minimise the use of potable water through the use of rainwater harvesting measures (such as water butts) to capture excess rainwater. 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 and 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); Hillingdon Local Plan Part 2 Saved Unitary Development Plan Policy OE8; Policy DMEI 10 Water Management, Efficiency and Quality in emerging Hillingdon Local Plan Part 2 Development Management Policies (with Main Modifications March 2019); Policy 5.12 Flood Risk Management of the London Plan (March 2016); To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016); Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016); National Planning Policy Framework (February 2019); and the, Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

PLANNING POLICY OFFICER

Designations:

Green Belt

Hayes Housing Zone

Archaeological Priority Area

Principle of Development:

The Design and Access statement identifies that the site is currently occupied by a vacant building most recently in use by the Sea Cadet Scouts and small number of storage containers used by Council contractors. At present all of the buildings on site are vacant.

The site is located in the Green Belt on the northern edge of Cranford Park. It also falls within the Hayes Housing Zone area which is an area of the borough expected to deliver a significant proportion of the borough's housing requirement.

The proposed development is for the demolition of the existing buildings and the construction of 2 family houses and a public car park to serve Cranford Park. The application will also widen the existing road access to the site and create a new play area within Cranford Park.

As the site was most recently in use by the Sea Cadets and for storage it is considered that the current uses on site fall within the F2 and B8 use classes. As an F2 community use, the loss of the

existing use should be assessed against policy DMCI1 which seeks to protect existing community uses. The applicant states that the lease with the Sea Cadet Scouts was terminated in 2010 however no evidence is provided to demonstrate if alternative provision has been made for the Sea Cadets or if the building has been marketed for other community uses. Consequently, it is assumed that the application is intended to meet criteria C of policy DMCI 1 which is to justify the loss of the existing community use through the redevelopment of the site to provide an overriding public benefit. In this instance the public benefit is to support greater use of the Cranford Park through the provision of a new car park and playground and through the provision of additional family housing. In addition it is argued that the site is currently in a poor condition and attracts anti-social behaviour which would also be addressed through its redevelopment. It is considered that these are public benefits which taken together can be considered significant. It is noted that the nearest alternative Sea Cadet groups are located in Ruislip and Feltham demonstrating that there is some alternative provision within a reasonable distance. On this basis the proposed loss of the community building could be justified in accordance with DMCI 1 part C.

It is noted that whilst there is some B8 storage on site, this is temporary in nature in the form of storage containers and would not result in the loss of industrial land.

In terms of the proposed use, whilst the Local Plan supports the principle of new housing development, this site is located within the Green Belt where there is a presumption against inappropriate development except in very special circumstances. There are some exceptions to this approach set out in the NPPF which includes the complete redevelopment of previously developed sites in the Green Belt where this would not have a greater impact on the openness of the Green Belt and the purposes of including land in the Green Belt. Local Plan Policy DME1 4 also sets out parameters for assessing whether the proposed redevelopment of sites in the Green Belt will have a greater impact on openness. This includes height and built, proportion of the site development, footprints and visual amenity.

The applicant identifies that at present the former Cadets building has a footprint of 202sqm. The footprint of the proposed houses will be 125sqm which is a reduction of approximately one third although the new buildings will be taller. The proposed car park will also be located on areas of existing hardstanding within the site. As a result of the proposed layout, the applicant has identified that there will be a net gain of 99sqm of soft landscaped area across the site when compared to the current layout. On this basis it is considered that the site could fall within exception 145 (g) subject to an assessment of the overall impact on the openness of the Green Belt.

In terms of the proposed uses, the proposed dwellings meet the Council's minimum internal and amenity requirements. The Local Plan does not set parking standards in relation to public parks. However policy EM4 of the Local Plan Part 1 seeks to enhance the borough's network of open spaces. The provision of enhanced access to the park supports the delivery of this objective.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The application site and Cranford Park are included in their entirety, in the Green Belt. The main policy issue in relation to this development is considered to be the principle of additional development within the Green Belt and its impact on the openness, character and appearance of the Green Belt.

The National Planning Policy Framework (NPPF) is relevant. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. Nevertheless, the document states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the

essential characteristics of Green Belts are their openness and their permanence. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 143 of the revised NPPF states that inappropriate development is, by definition, harmful to Green Belt and should not be approved except in 'very special circumstances'.

According to paragraph 144 of the revised NPPF, when determining applications, LPAs should ensure that substantial weight is given to any harm to the Green Belt; 'very special circumstances' will not exist unless the potential harm to Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

However, Paragraph 145 states that limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development would not be inappropriate in the Green Belt.

Paragraph 146 sets out types of development that are not inappropriate within the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include the material changes in use of land.

London Plan Policy 7.16: Green Belt - Emphasises the importance of the Green Belt and its protection from inappropriate development, noting that applications should be considered in accordance with national guidance and that inappropriate development should be refused, except in very special circumstances. The Policy states that 'development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance';

Policies in the Hillingdon Local Plan reflect national and London Plan guidance. The London Borough of Hillingdon Local Plan: Part 1 Policy EM2: (Green Belt, Metropolitan Open land and Green Chains) states that the Council will seek to maintain the current functions of the Green Belt and that any development proposed within the Green Belt will be considered against national and London Plan policies.

The London Borough of Hillingdon Local Plan: Part 2 Policy DMEI 4 (Development in the Green Belt or on Metropolitan Open land) reiterates that inappropriate development will not be permitted unless there are very exceptional circumstances, while noting that redevelopment on sites will be permitted only where they would not harm openness or conflict with the purposes of including land within the Green Belt.

With regard to the purposes of including land within the Green Belt, it is considered that the proposed play area is not inappropriate development, and does not not conflict with the five purposes set out in the NPPF. Thus, this element of the proposal would not result in unrestricted urban sprawl (a), nor the merging of neighbouring settlements (b), nor result in encroachment into the countryside (c), nor affect the setting and special character of historic towns (d), nor would it prejudice urban regeneration elsewhere in the borough (e). In addition, it is not considered that this element of the proposal would materially affect the openness of the Green Belt.

With regard to other elements of the scheme, notwithstanding the fact that the works (houses and car park) would not increase the developed area of the site, it is considered

that cumulatively, the proposed development would have a slightly greater impact on the openness of the Green Belt in this location, thereby failing to meet the exemption tests set out in para.145 of the NPPF. On balance it is therefore considered that the proposal as a whole constitutes inappropriate development. The applicant has therefore set out 'very special circumstances' to justify such development. The very special circumstances of these proposals are that:

- This Green Belt site would be enhanced and 99 square metres of hard surfacing would be returned to soft landscaping.
- After many years of dereliction, the application site would return to beneficial uses, much of it accessible to the public.
- The building of the two houses would provide natural surveillance, ending the site's seclusion, which in turn will help deter the site's long history of anti-social behaviour.

The applicant submits that if the old Sea Cadet Hut were demolished, the site tidied and the existing hard standing laid out for public parking, the anti-social behaviour on this site and in the immediate area would not abate. The site is screened from North Hyde Road by tree cover and from the terrace of houses by their back gardens and fences. When walking down Watersplash Lane, the blind bend, the narrowness of the lane and the park opposite means that it is very secluded with no natural surveillance. All these factors enable the anti-social behaviour and it is likely that this situation would continue were the site merely to be laid out as car parking.

The building of the two houses would ensure an oversight and a natural surveillance over this area of car parking, which would be essential to enhance this site, render it of benefit to the local community and help keep it problem free. Although the widening of the access road is required for this development, it would be a major advantage to open up views through to the park entrance, both from the point of view of giving the entrance the importance and status that it requires and to deter the tipping which occurs frequently either just in front of the entrance gates or just over the fence in the park.

- Access to Green Belt Recreational Land

The applicant submits that the public car park would be of great benefit to the visitors to Cranford Park, attracted by the new facilities and events programme forming part of the project. It would help the viability of the project as a whole, but particularly encourage the use of this northern part of the park.

The proposals for Cranford Park, which would include an improved entrance with lighting and cameras and the addition of a children's playground, would enhance the enjoyment and legibility of Cranford Park and enhance this northern section considerably, attracting visitors to spend time there. These proposals thus accord with the spirit of exception (b) pra 145 (outdoor recreation) of the NPPF.

Moreover, Watersplash Lane marks the northern extent of Cranford Country Park. The use of the application site in conjunction with the proposed restoration of the buildings and landscape at Cranford Park has been a consideration since the Round 1 Bid, submitted to the National Lottery Heritage Fund in August 2017. At that time it was considered as a potential car park site. However, the lack of natural surveillance, the ongoing ASB problems and the poor vehicular access did not make this a practical proposition, despite

the need for a car park at this important entrance to the park.

The widening of Watersplash Lane, necessary for the car park, would greatly benefit the park by opening up views of the park's entrance. This in turn would deter some of the fly tippers who dump material in front of the gate or just over the fence. There would be an additional benefit for the cycling proposals.

- The Contribution of the Application Site to the Viability of the Project as a Whole

Cranford Park has one vehicular entrance from The Parkway, which is difficult to negotiate and single track. It leads to an existing car park of 39 spaces. As part of the project, a passing place will be created on the entrance drive and the car park would be extended so as to accommodate 49 spaces. However, given that the project would include cafe, toilets, meeting places, site offices, an office to let, interpretation, cycle tracks, trails and a full Activity programme of events and volunteering opportunities, there is predicted to be a considerable uplift in visitor numbers.

Of the six pedestrian entrances, by far the most used (there are visitor sensors on all the entrances) are the footpath from Roseville Road and the entrance in Watersplash Lane. Neither of these accommodates any car parking at present: Roseville Road is a residential street which is quite heavily parked up, and Watersplash Lane is too narrow in itself to permit parking and too close to the Bulls Bridge roundabout and the congested North Hyde Road to offer any nearby car parking facilities.

Thus the car park afforded by this application (which would have parking charges and be supervised), the improvements to the road with its improved sightlines, the enhanced presence of the entrance way, the opportunities to include surface water drainage (which at present does not exist) and the creation of a children's playground would be of great benefit to the park and very crucial to its viability, especially in its objective of attracting visitors from the Hayes Housing Zone to the north and west.

Moreover, there is a proposal for a cycle track from the Canal, south down Watersplash Lane and through the northern section of the park, joining then with a circular track around the park. The safety of cyclists would be increased through the highway improvements to Watersplash Lane.

Now that the Crane PH has planning permission for redevelopment for residential, with highways improvements and a S106 contribution towards enhancing the entrance to the park, and the Round 2 Bid for the Cranford Park project has been awarded funding by the National Lottery Heritage Fund, this is the optimum time to carry out a co-ordinated enhancement of this whole area, to render it attractive and a welcoming entrance to Cranford Park.

- The proposed woodland tree planting around the site would improve ecology and the air quality in this Air Quality Focus Area.

- The development would enable the construction of a children's playground (314 square metres) at the northern end of the park, and this would be of community benefit to the families moving into the many new residential blocks in the area.

- Enhanced Community use of the site

Policy DMCI 1: Retention of Existing Community Facilities states that proposals involving the loss of an existing community facility will be permitted if:

- i) the specific use is no longer required on-site. In such circumstances, the applicant must provide evidence demonstrating that:
 - a) the proposal would not lead to a shortfall in provision for the specific use within the local catchment area;
 - b) there is either no demand for another suitable social infrastructure use on-site, or that the site/premises is no longer appropriate for social infrastructure uses; and
 - c) any replacement/relocated facilities for the specific use provides a level of accessibility and standard of provision at least equal to that of the existing facility.
- ii) the activities carried out are inconsistent and cannot be made consistent with acceptable living conditions for nearby residents; and
- iii) the redevelopment of the site would secure an over-riding public benefit.

This site in the Green Belt and has had a previous community use. However it has not been considered suitable for such a use in recent years due to the condition of the existing building and its surroundings, an unsuitable access road and the persistent anti-social behaviour which takes place on and around the site.

As stated elsewhere in this report, it is considered that the applicant has demonstrated that the specific use is no longer required on-site, that another suitable social infrastructure use will be established on-site and the redevelopment of the site would secure an over-riding public benefit, in compliance with policy Policy DMCI1 of the Local Plan Part 2 - Development Management Policies (2020).

. A proposal to improve the location would have a beneficial effect on the lives of local residents and assist the Council and the police in tackling crime and disorder there.

· Addressing the Shortage of High Quality, Accessible Open Space in the Hayes Area

The population to the north and west of the Application Site is densely populated and growing through in-migration, supported by very considerable housing development taking place in the area, notably in the Hayes Housing Zone just to the north of North Hyde Road. By 2026, the population of this area is projected to increase by 21%.

It is to be noted that the Strategic Infrastructure Study, commissioned in 2017 as part of the Evidence Base for Local Plan 2, has identified a considerable shortage of high quality, accessible open space in the Hayes area.

The project at Cranford Park will make a very significant contribution to the provision of high quality and accessible open space in the area, with the restoration of historic buildings and landscape, a number of attractive visitor facilities and a full events programme. It is anticipated that, when the residential developments come forward in Hayes, this park entrance in Watersplash Lane will become an important gateway for visitors.

In addition, in terms of usage, the existing building was last used as a community facility and storage. Comparing the impact on the Green Belt of the existing authorised use with the proposed change of use for residential purposes and a public car park, the impact in terms of activity is considered to be comparable. Therefore, it is considered that the proposed use does not have a materially greater impact in terms of its use than the former

use on the openness of the Green Belt,

Officers consider that the benefits, when weighed against the drawbacks of the proposed development are significant and therefore very special circumstances weighing in favour of the proposal exist in the case of the proposed development. The proposal is considered to be in accordance with the aims of national, regional and local policies and a case of very special circumstances sufficient to justify an exception to Green Belt policy has been established. The proposal is therefore considered acceptable in principle.

Notwithstanding the above, in assessing the application, it will be necessary to determine whether material planning benefits outweigh any planning objections or potential harm, relating to visual and landscape impacts, noise and flooding, air quality, traffic movements, duration of operations and ecological impacts.

7.02 Density of the proposed development

Policy 3.4 of the London Plan (2016) seeks to ensure that the new development takes into account local context and character, the design principles in Chapter 7 and public transport capacity development should optimise housing output for different types of location within the relative density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.

Policy DMHB 17 of the Hillingdon Local Plan Part 2: Development Management Policies (Jan 2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2. Developments will be expected to meet habitable rooms standards.

The density matrix, however, is only of limited value when looking at small scale development such as that proposed with this application. The density ranges set out in the London Plan are not used in the assessment of schemes of less than 10 units. In such cases, it is often more appropriate to consider how the development harmonises with its surroundings and its impact on adjoining occupiers.

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

Policy HE1 of the Local Plan Part 1 aims to conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape.

Policy BE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) states that all new developments should achieve a high quality of design in all new buildings and the public realm contributes to community cohesion and a sense of place.

Policy DMHB 11 Local Plan: Part Two - Development Management Policies (2020) advises that all development will be required to be designed to the highest standards and incorporate principles of good design. It should take into account aspects including the scale of the development considering the height, mass and bulk of adjacent structures; building plot sizes and established street patterns; building lines and streetscape rhythm and

landscaping. It should also not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The site does not fall within a conservation area, or area of special character. However the site lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan.

Historic England (GLAAS) advises 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, in consideration of the nature of the development, the archaeological interest and/or practical constraints are such that 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.

Subject to this condition, it is considered that no substantial harm would therefore occur. Consequently, it is considered that there are no significant heritage implications arising from the proposed development, in compliance with Policy HE1 of the Local Plan Part 1, Draft London Plan (2019) Policy HC1 and the NPPF.

7.04 Airport safeguarding

There are no airport safeguarding considerations relevant to this application.

7.05 Impact on the green belt

Although the Application Site is owned by the Council, it has not been open to the public since the Sea Cadets left, many years ago. It is surrounded by a tall security fence and locked gates and the existing building and the site in general are in poor condition. Moreover, much of the site was concreted over for hard standing many years ago.

The planning proposals would result in a net increase in soft landscaping of 99 square metres. The existing scout building is 201 square metres, whereas the proposed pair of semi-detached houses are 140 square metres. The public car park would utilise the existing hardstanding area, although some of this would revert to soft landscaping, to soften the edge of the site and keep it more open. The concrete plinth, which is situated in an area of open space, would be removed and become grassed again.

It is considered that the proposals would allow a much better use of the site, and one which would be carefully designed to enhance its appearance, increase its openness and allow public access and use of much of its area. The proposal involve a building in an area of the site that has been previously developed. In addition, the car park layout will be on an area of existing hard standing. Given the existing landscape character, and the proposed planting strategy, including the woodland planting to the north and east of the site, it is considered that the visual impacts of the proposal are unlikely to be of significant detriment to the character of the area, or the perception of openness of the Green Belt. It is therefore not considered that the amenity and openness of the Green Belt would be harmed to a detrimental degree by the proposals, in accordance with relevant Green Belt policies.

7.07 Impact on the character & appearance of the area

Policies 7.4 and 7.6 of the London Plan (2016) and chapter 7 of the National Planning Policy Framework (2018) stipulate that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future. In addition, Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

Policy BE1 of the Local Plan: Part 1 Strategic Policies (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

Policy DMHB 11 (Design of new development) of the Local Plan: Part 2 - Development Management Policies (2020) says (amongst other things) that development will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
 - architectural composition and quality of detailing;
 - local topography, views both from and to the site; and
 - impact on neighbouring open spaces and their environment.

The layout of the new development has been dictated by the shape and constraints of the site and has sought to avoid building on the soft landscape areas. The proposed car park and houses are sited primarily on the existing building footprint and existing hard surfaces.

The plot backs on to gardens of terrace houses fronting Watersplash Lane, with dense matured trees on the other three sides. The proposed houses will therefore be relatively isolated, not being readily visible from North Hyde Road or Watersplash Lane. As such, they will have little impact on the visual amenities of the surrounding area or street scene. The presence of houses on the site would be akin to "park lodges", helping to keep watching eye on the public car park, in addition to other security measures.

The scale and proportion of the pair of semi detached 2 storey houses are considered to blend in satisfactorily within the surrounding context and will be unobtrusive in terms of bulk and massing. They will be orientated back to back with the existing terrace in Watersplash Lane, with a distance of 25m at the closest point between the existing and new houses.

Overall the proposed building with respect to its size, scale, design and location is considered to reflect the character of the existing streetscene and is therefore acceptable, in compliance with policy DMHB 11 (Design of new development) of the Local Plan: Part 2 - Development Management Policies (2020).

7.08 Impact on neighbours

Policy DMHB 11 Local Plan: Part Two - Development Management Policies (2020) advises that proposals should not have an adversary impact on the amenity, daylight and sunlight of adjacent properties and open space. Policy DMHD 1 also requires that there should be no unacceptable loss of outlook to neighbouring occupiers.

The proposed dwellings will be separated an adequate distance from the nearest residential properties in Watersplash Lane. Accordingly, the proposal is not considered to have a significant detrimental impact on residential amenity, in accordance with Policies DMHB 11 and DMHD 1 Local Plan: Part Two - Development Management Policies (2020).

7.09 Living conditions for future occupiers

On 25 March 2015, the Government introduced new technical housing standards in England, which comprise of new additional 'optional' Building Regulations on water and access, and a nationally described space standard (referred to as "the new national technical standards"). These new standards came into effect on 1 October 2015. The Mayor of London has adopted the new national technical standards through a minor alteration to The London Plan.

Policy DMHB 16 advises all housing developments should have an adequate provision of

internal space in order to provide an appropriate living environment. The proposed dwellings meet the minimum floorspace requirements.

Policy DMHB 18 advises that all new residential development and conversions will be required to provide good quality and usable private outdoor amenity space and for a 3 bed property of 60 sqm per unit should be provided. The proposed development would deliver 103 and 130 sqm respectively of private amenity space for each of the residential units, which accords with policy DMHB18 of the Local Plan Part 2 (2020).

7.10 Traffic impact, Car/cycle parking, pedestrian safety

Policy DMT 2 of the Local Plan: Part Two - Development Management Policies (2020) advises that development proposals must ensure that safe and efficient vehicle access to the highway network is provided to the Council's standards; they do not contribute to the deterioration of local amenity or safety of all road users and safe secure and convenient access and facilities for cyclists and pedestrians are satisfactorily accommodated in the design.

Policy DMT 6 advises development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity.

Local Plan Part 2 Policies DMT 1 and DMT 2 require the Council to consider 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.

The proposal is to widen and improve the existing road suitable for two-way traffic and safe movement of pedestrians to the site and park. The improvements will benefit the owners of the existing houses in Watersplash Lane, with new dropped kerbs to their forecourt parking.

In comparison to the previous redundant community/storage use when fully active, the anticipated trip generation related to the new development does not raise any immediate highway concerns, subject to detailed design of the revised road layout and road junction. Any uplift in traffic generation is considered marginal and therefore can be absorbed within the local road network, without notable detriment to traffic congestion and road safety.

Waste collection distances between the proposed waste collection point and a refuse vehicle should not exceed the recommended distance of 10m in order to conform to the Council's waste collection standard. There is also a requirement for carrying distances from each residential unit to not exceed a distance of 30m. It is acknowledged that these parameters are achievable within the presented design which enables a refuse vehicle to collect from a suitably located 'waste sack' collection point within the car park.

The Highway Engineer has no principle objections to the proposals, but requests that the developer enters into a S106 legal agreement, which obliges the developer to enter into a S278 Agreement under Highways Act 1980, thereby allowing such works to be carried out. The implementation of these works would be subject to the receipt and subsequent approval of detailed designs.

The application has been reviewed by the Highway Authority who are satisfied that the proposal would not discernibly exacerbate congestion or parking stress, and would not raise any highway safety concerns, in accordance with Local Plan Part 2 Development Plan Policies DMT 1, DMT 2 & DMT 6 and Policies 6.3, 6.9, and 6.13 of the London Plan

2016).

7.11 Urban design, access and security

SECURITY

The Design Out Crime Officer Metropolitan Police Service has made a number of recommendations, should the development be approved. A summary of these recommendations, and how they have been addressed is provided below.

- Car park to be gated at its entrance (as close as possible to the road) the car park to be locked at night.

A gate has been provided at the entrance to the car park, which is to be kept locked during hours of darkness. The location is shown on the revised site plan. Details of the gate, including hours of closure to be conditioned.

- The residential parking bays to be positioned in the two most north eastern parking spaces (outside the houses) this will mean there is informal surveillance from the houses over their cars. However a secondary gate is required to protect these two houses. The location is shown on plan. Details to be conditioned

- A line of security between the houses and car park in the form of a 2.4m high fence (if closed board wooden fencing can be 2.1m+30cm trellis)if the building line forms part of the security line between the houses and the car park please ensure appropriate defensive planting (mature at the time of completion) is planted along the building to prevent graffiti, and to protect windows from potential burglars. Details to be secured as part of a landscaping condition.

- The two gates should be security rated (LPS1175/Issue 7 SR1) the primary gate during the hours of darkness to be locked. The gates need to have a fob to control them so that the two residential properties will have, and an intercom with the ability to open the gates from the homes to allow visitors access. The secondary gate would be just for the two residences, again a fob and intercom required. Details to be conditioned.

- Secured By Design accreditation is met. This has been secured by condition.

- The car park must achieve a Park Mark award from the British Parking association upon its completion. This has been secured by condition.

A lighting scheme has now been submitted for the current proposal. This will include improved street lighting along Watersplash Lane as well as external lighting for the proposed public car park and onward entrance to Cranford Park. It is considered that the proposed lighting, comprising street lighting to the highway and bollard lighting for the car park, strikes the requisite balance between the need to address security issues and highway safety, whilst respecting the Green Belt status of the site, as well as ecological considerations. The external lighting scheme will be implemented before the development is brought into use/occupied. This has been secured by condition.

It is considered that should these crime prevention measure be adopted, the scheme will promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 and ensure the development provides a safe and secure environment, in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

7.12 Disabled access

Para 127 (f) of the NPPF says that the aim should be to create places that are safe, inclusive, accessible and which promote health and well being with a high standard of amenity for existing and future users.

Policy 3.8(c) of the 2016 London Plan requires all new housing to be designed and constructed as accessible and adaptable in accordance with M4(2) as set out in Approved Document M to the Building Regulations (2015 edition).

At present it would be very difficult for a disabled person to visit this northern part of the park, due to the lack of parking and the difficulties of negotiating North Hyde Road. The public car park would open up possibilities which, with the new track to be installed through the northern part of the park, would allow much greater accessibility into the park and down to the new facilities. The car park would include four disabled parking bays.

The Access Officer has not raised any concerns subject to conditions. The proposal therefore complies with Policy 3.8(c) of the 2016 London Plan.

7.13 Provision of affordable & special needs housing

Not relevant to this proposal.

7.14 Trees, landscaping and Ecology

Policy DMHB 14 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping where appropriate.

There are no TPO's affecting the site or Conservation Area designations. The site lies within the Green Belt.

All the matured trees along North Hyde Road will remain including all trees along the boundary adjoining Cranford Park. The improvements to the access road will involve removal of 3 trees to allow widening and improvements to the road and public foot path. New replacement trees are proposed along the access road and within the Cadets site. The car park will also include areas of landscaping to provide permeable surfaces

In addition, woodland planting is proposed on land to the north and east of the site. This is to be secured by way of a legal agreement/statement of intent.

It is considered that this will more than compensate for the loss of the three roadside trees in Watersplash Lane, which need to be felled for the widening of the road.

The Landscape Officer has not raised any objections, subject to conditions for tree protection measures and landscaping subject to the imposition of root protection conditions and future landscaping works which have been added.

Subject to appropriate landscaping conditions/legal agreement to ensure that the detailed proposals preserve and enhance the character and appearance of the area, it is considered that the scheme is on the whole acceptable and in compliance with Policy DMHB 14.

ECOLOGY

With only grassed areas and a limited number of trees being lost, and suitable provision having been made for their replacement, the proposal would not result in any significant

material impact on the ecological value of the site.

7.15 Sustainable waste management

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management policies (January 2020) requires new developments to be provided with satisfactory arrangements for the storage and collection of waste and recycling. Refuse storage needs to be well-designed; external bins should be located and screened to avoid adverse visual impacts and nuisance to both occupiers and neighbours.

The proposed dwellings will be able to provide secure refuse storage on site and the collection of refuse is within the required parameters and is therefore acceptable. The proposal therefore complies with Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) in regards to waste management.

7.16 Renewable energy / Sustainability

The NPPF paragraph 151 requires new development to help increase the supply of renewable and low carbon energy.

The new houses will be designed and insulated to a high specification and water conservation will include low water usage toilet flush and taps. Timber will come from sustainable sources.

7.17 Flooding or Drainage Issues

Policy EM6 (Flood Risk Management) of the Local Plan Part 1 Strategic Policies (Adopted Nov. 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated. London Plan policies 5.12 and 5.13 require development proposals to use sustainable urban drainage systems (SUDS) unless there are good reasons for not doing so.

The area subject of this planning application is not in a flood zone, critical drainage area nor surface water area, although these zones and areas do occur to the east alongside the River Crane.

It has been noted that there is no drainage provision along Watersplash Lane at present. To rectify this, a swale would be cut into the verge immediately north of the park and a drainage ditch along the southern boundary of the car park.

While the design and access statement confirms that the car park will be formed of permeable paving, the details of the design, as well as proposals for the drainage of the roof areas of the proposed houses are not included within the information submitted. As such, a surface water management condition has been requested by the Council's specialist officer, to ensure that the development meets local planning policies in restricting runoff to pre-development greenfield runoff rates (Part B of Local Plan Part 2 Policy DME1 10).

7.18 Noise or Air Quality Issues

NOISE

Policy DMHB 11 of the Hillingdon Local Plan: Part Two - Development Management Policies (January 2020) states that developments should not adversely impact on amenity. Policy 3.5 of the London Plan (2016) seeks to ensure that housing developments protect and enhance the residential environment.

In terms of usage, the existing site was last used as a community facility and storage. Comparing the activity of the existing authorised use with the proposed change of use for

residential purposes, the impact in terms of activity is considered to be comparable. In addition, the car park afforded by this application would be controlled and supervised, It is therefore not considered that the proposed development would lead to any significant increase

in noise to adjoining properties in Watersplash Lane, in compliance with Policy DMHB 11 of the Hillingdon Local Plan: Part Two -Development Management Policies (January 2020) and Policy 3.5 of the London Plan (2016).

AIR QUALITY

It is not considered that the proposed development would have an adverse impact on air quality within the locality. Notably, the woodland planting proposed would help mitigate the pollution of North Hyde Road (an Air Quality Focus Area).

7.19 Comments on Public Consultations

All representations relating to character and appearance of street scene, impact upon the residential amenities of the adjoining neighbours, additional traffic/parking, trees would constitute material planning considerations and have been addressed within the main body of the report

7.20 Planning obligations

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.

At a regional level, policy 8.2 'Planning Obligations' of the London Plan (2016) stipulates that when considering planning applications of strategic importance, the Mayor will take into account, among other issues including economic viability of each development concerned, the existence and content of planning obligations. It also states that development proposals should address strategic as well as local priorities in planning obligations.

Policy DMCI 7 of the Local Plan: Part Two (2020) seeks to ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Planning obligations are sought on a scheme-by-scheme basis to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

Relevant Officers have reviewed the proposal, as have other statutory consultees. The comments received indicate the need for the following contributions or planning obligations to mitigate the impact of the development.

(i) Transport: The applicant shall agree to the full and complete costs to undertake the necessary works, as identified by the Council, for on site and off site highways works as a result of this proposal including:

a) Improvements to the junction of Watersplash Lane and North Hyde Road
b) Traffic management measures to be implemented on Watersplash Lane, comprising widening of the carriageway, provision of pedestrian footways, street lighting improvements, waiting restrictions, reconstruction of kerbing on both sides of Watersplash Lane and road signage.

ii) Off site landscape and ecological enhancements on land to the north and east of the application site

iii) The applicants pay a sum to the Council equivalent to 2% of the value of contributions for compliance, administration and monitoring of the completed planning (and/or highways) agreement(s).

(iv) Car Park and Play Area to remain publicly accessible at all times

(v) The applicants pay a sum to the Council of 3% of the value of contributions for specified requirements to project manage and oversee implementation of elements of the completed planning (and/or highways) agreement(s).

CIL

The Council adopted its own Community Infrastructure Levy (CIL) on August 1st 2014 and the Hillingdon CIL charge for residential developments will be applicable, as well as the Mayoral CIL charge.

7.21 Expediency of enforcement action

Not relevant to this proposal.

7.22 Other Issues

Contaminated Land

The standard condition on site investigations will be imposed.

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

It is considered that the argument for very special circumstances, as required in paragraph 144 of the NPPF, for the building of a pair of semi-detached houses and a public car park in the Green Belt, is robust and compelling. The proposals would greatly improve this site, which has been subject to anti-social behaviour for many years. The proposals would enhance the appearance and bring back community benefit to the site, sustained through natural surveillance.

The improvements to the entrance to Cranford Park, the access road and park facilities would be of great community benefit and would make this important section of the park, which is not greatly used at present, a real asset for the community, particularly for families moving into the new residential developments in the area.

In terms of the loss of a community facility, the applicant has demonstrated that the specific use is no longer required on-site and the redevelopment of the site would secure an over-riding public benefit, in compliance with policy Policy DMCI 1 of the Local Plan Part

2 - Development Management Policies (2020).

11. Reference Documents

Hillingdon Local Plan Part 1 - Strategic Policies (November 2012).

Hillingdon Local Plan Part 2.

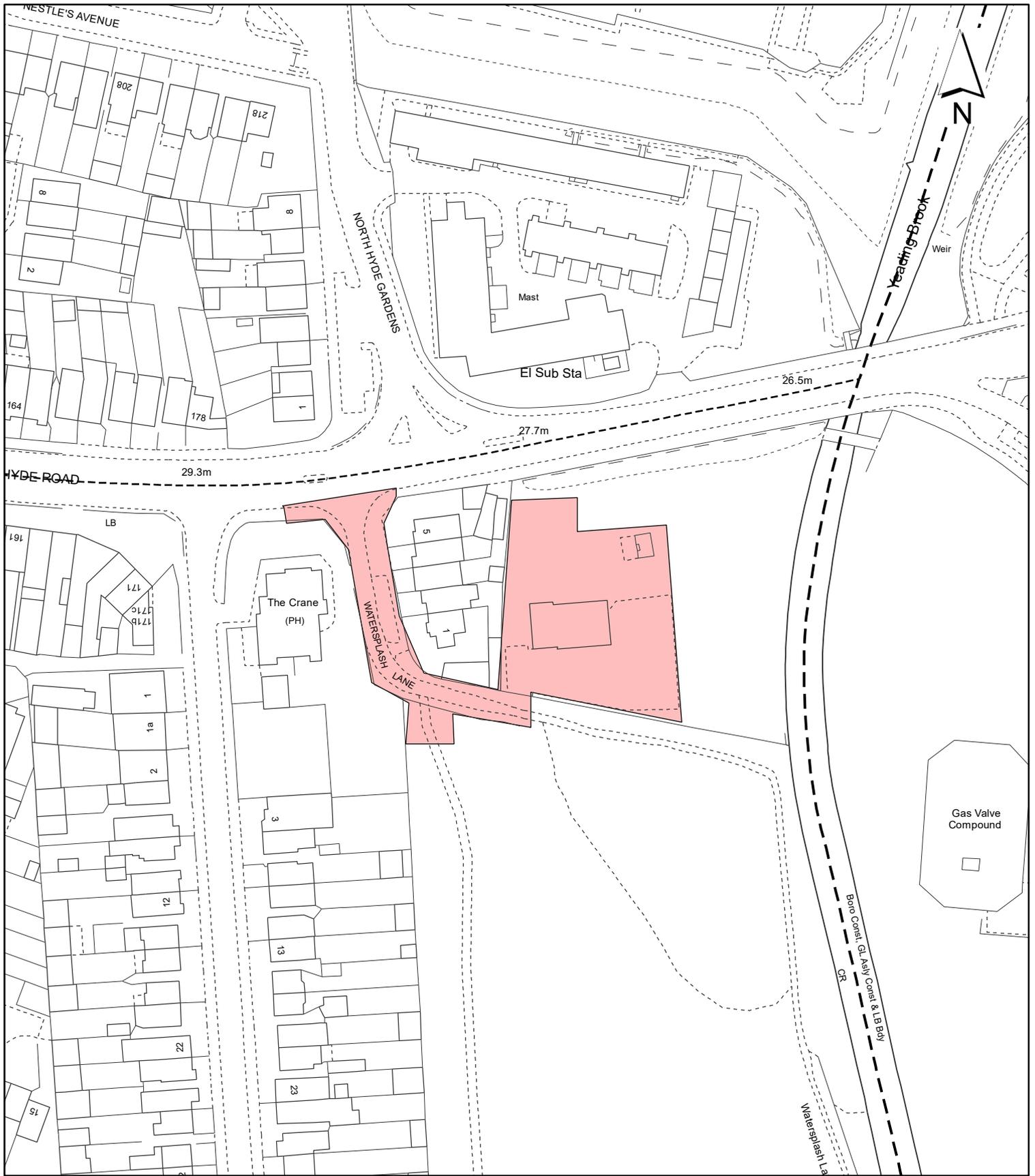
The London Plan (2016).

Supplementary Planning Document 'Accessible Hillingdon'.

National Planning Policy Framework.

Contact Officer: Karl Dafe

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Notes:

 Site boundary

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Site Address:

**Former Sea Cadets Site
 Watersplash Lane
 Hayes**

**LONDON BOROUGH
 OF HILLINGDON**
 Residents Services
 Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW
 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:

15604/APP/2020/283

Scale:

1:1,250

Planning Committee:

Major

Date:

November 2020



HILLINGDON
 LONDON