Report of the Head of Planning, Transportation and Regeneration

Address HPH4 MILLINGTON ROAD HAYES

Development: Re-development of the vacant Site to provide a residential development comprising 131 (C3) residential units, with associated amenity areas, landscaping, car parking and all ancillary and enabling works.

LBH Ref Nos: 76655/APP/2021/3039

Drawing Nos:
Design and Access Statement (Dated July 2021)
3552_PL(90)000 Rev. P01
3552_PL(20)202 Rev. P01
3552_PL(20)110 Rev. P01
3552_PL(20)203 Rev. P01
3552_PL(20)204 Rev. P01
3552_PL(20)205 Rev. P01
21.064-BOSK-ZZ-00-DR-L-1000 Rev. P4
21.064-BOSK-ZZ-01-DR-L-1000 Rev. P3
3552_PL(90)001 Rev. P01
21.064-BOSK-ZZ-ZZ-DR-L-1000 Rev. P4
3552_PL(40)101 Rev. P01
3552_PL(40)102 Rev. P01
3552_PL(40)103 Rev. P01
3552_PL(40)104 Rev. P01
3552_PL(40)105 Rev. P01
3552_PL(70)101 Rev. P01
3552_PL(70)102 Rev. P01
20.064-BOSK-00-RP-L-0003 Rev. P01
2101320-05 Delivery & Servicing Management Plan (Dated July 2021
3552_PL(20)201 Rev. P01
2101320-10A Utilities & Services Statement (Dated August 2021
2101320-06A Car Park Management Plan (Dated August 2021
2101320-07 Outline Construction Logistics Plan (Dated July 2021)
Circular Economy Statement (Dated 30th July 2021)
3552_SC_001 Rev. P01 Summary Schedule
Daylight, Sunlight and Overshadowing Report V1 (Dated July 2021
Statement of Community Involvement (Dated July 2021
Wind Microclimate (Dated July 2021)
3552_PL(20)120
F10128 Fire Statement Version 01 (Dated 3rd September 2021
Independent Daylight, Sunlight and Overshadowing Review Response (Dated 15th October 2021)
EAS/P1234/C1 Aviation Safeguarding Assessment (Dated 21st July 2021
Planning Statement (Dated July 2021)
2101320-02A Transport Assessment (Dated August 2021)
2101320-04A Travel Plan (Dated August 2021
2101320-08 Flood Risk Assessment and Drainage Strategy (Dated July 2021)
Energy and Sustainability Statement (Dated 30th July 2021
2101320-09 Air Quality Assessment (Dated July 2021)
5796/21-01 Aboricultural Survey (Dated April 2021

P3284J2275/SL Desk Study / Preliminary Risk Assessment Report (Dated 10th May 2021)
Townscape, Visual and Heritage Assessment (Dated July 2021)
Preliminary Ecological Appraisal (Dated May 2021)
3552_PL(20)101 Rev. P03
3552_PL(20)102 Rev. P03
3552_PL(20)103 Rev. P03
3552_PL(20)104 Rev. P03
3552_PL(20)300 Rev. P03
3552_PL(20)105 Rev. P03
3552_PL(20)106 Rev. P03
3552_PL(20)107 Rev. P03
3552_PL(20)108 Rev. P03
3552_PL(20)109 Rev. P02
3552_PL(20)301 Rev. P03
3552_PL(20)302 Rev. P03
3552_PL(20)303 Rev. P03
3552_PL(20)304 Rev. P03
Viability Model - 15% Social Rent (by habitable room
2101320-11 Noise Technical Note (Dated 19th October 2021
3552_PL(70)103 Rev. P02
3552_SC_001
3552_SC_002
3552_SC_003
3552_SC_004
Figure 1 Rev. P01
P1085_SK(30)000

Date Plans Received:	05/08/2021	**Date(s) of Amendment(s):**	18/10/2021 05/08/2021 05/01/2022
Date Application Valid:	05/08/2021		

1. SUMMARY

Full planning permission is sought for the re-development of the vacant site to provide a residential development comprising 131 no. residential units (Use Class C3), with associated amenity areas, landscaping, car parking and all ancillary and enabling works.

The proposed development would provide 14 no. Social Rent units (equivalent to 15% of the total provision when measured by habitable room) on the first, second, third, fourth and fifth floors of Core B, comprising 4 no. 2-bedroom units and 10 no. 3-bedroom units. Although this does not meet the 35% affordable housing target stated under Policy H5 of the London Plan (2021), it would positively contribute to meeting the Council's affordable housing needs and is notably supported by the Council's Housing Team. It is also agreed that this affordable housing offer is the maximum viable affordable housing provision possible with the tenure that best meets the needs of the Borough. This would be secured by the Section 106 legal agreement, alongside an Early and Late Stage Viability Review, if approved.

The proposed part 7-storey, part-8 storey and part 9-storey building blocks are viewed within the context of a urban/suburban area, which comprises a mix of characteristics

which ranges from 7 storey buildings located within the Hyde Park Hayes estate to 2 storey buildings on surrounding residential roads. Based on the surrounding context, the scale and mass of the proposed development is considered to be acceptable.

The quantity of private amenity space proposed would fall slightly short of the local plan standards and represents a minor policy conflict. Sufficient play space would, however, be provided, alongside a contribution for public open space enhancement within the Council's administrative area as the policy requirement under DMCI 4 has not been achieved on site.

The proposed development would provide 48 no. car parking spaces for 131 units, equating to 0.37 car parking spaces per unit. It is important to view the proposed development within the planning policy context of the London Plan (2021) and Table 10.3 attached to Policy T6.1 which states that Outer London sites with a PTAL rating of 4 should not exceed a maximum car parking provision of 0.5 spaces per dwelling. The application site has a PTAL rating of 4 and is located about 600 metres (9 min walk) from Hayes and Harlington Station with 4 bus stops within a 400 metre radius. Evidently, the application site is well connected. If recommended for approval, a number of planning obligations would be secured by Section 106 legal agreement and would contribute to the mitigation of any impacts that may arise from the proposed use. This includes a travel plan, a contribution towards a Parking Management Scheme Review, parking permit restriction and Active Travel Zone improvements. Subject to securing these measures, the proposal is considered acceptable with regard to its impact on the local highway network.

The proposed development is also considered acceptable with regard to its impact on neighbour amenity, access, security, highways, landscaping, ecology, refuse, energy, flooding, noise and contaminated land.

In summary, the proposed development is considered to be a suitable use of the site. Although the proposed development would technically conflict with local plan private amenity space standards, the conflict is considered to be minor and would be outweighed by the planning gain secured as part of a recommendation for approval. Material considerations therefore indicate that the application is acceptable subject to planning conditions and a Section 106 legal agreement and is therefore recommended for approval.

2. RECOMMENDATION

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

A)That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or any other legislation to secure the following:

i. Affordable Housing: Planning obligation for an on-site provision of 14 no. Social Rent units, comprising 4 no. 2-bedroom units and 10 no. 3-bedroom units. This shall include an Early and Late Stage Viability Review mechanism as defined by Policy H5 of the London Plan (2021).

ii. Air Quality Contribution: A financial contribution amounting to £105,242 shall be paid to address the air quality impacts of the proposed development.

iii. Carbon Offset Contribution: A financial contribution amounting to £147,983 shall be paid to the Council's carbon offset fund.

iv. Public Open Space: A financial contribution amounting to £175,000 shall be paid to the Council for the enhancement of existing public open space within the Council's administrative area.

v. Highways Works: Section 278 agreement to secure highway works.

vi. Local Highways Improvements: A financial contribution amounting to £47,462.50 shall be paid to the Council for the local highway improvements.

vii. Parking Management Scheme Review: A financial contribution amounting to £25,000 shall be paid to the Council for the review of local roads, with a view to implementing a Parking Management Scheme. This money will be held by the Council for a period of 5 years from final completion and any unused or residual monies after this date would be returned.

viii. Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such as matters as: targets for sustainable travel arrangements; effective measures for the ongoing monitoring of the Travel Plan; and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured.

ix. Parking Permits: The residents of this development will not to be eligible for parking permits within the Parking Management Areas and Council car parks in the vicinity of the site, apart from Blue Badge holders and a charge made against the site to ensure the future buyers are aware of the parking restrictions.

x. Employment Strategy and Construction Training: Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority. A financial contribution will only be accepted in exceptional circumstances.

xi. HUDU Health Contribution: A financial contribution amounting to £20,944 shall be paid to the Council for the enhancement of health infrastructure provision.

xii. Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions.

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

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

D) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Deputy Director of Planning and Regeneration), delegated authority be given to the Deputy Director of Planning

and Regeneration to refuse planning permission for the following reason:

'The applicant has failed to provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Affordable Housing, Air Quality, Emissions Reductions, Public Open Space, Highways Works, Highways Improvements, Travel Planning, Parking Permits, Employment Strategy and Construction Training, and Project Management and Monitoring). The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020); the adopted Planning Obligations Supplementary Planning Document (July 2014); Policy DF1 of the London Plan (March 2021); and paragraphs 54-57 of the National Planning Policy Framework (July 2021).'

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

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, numbers:

3552_PL(20)101 Rev. P03;
3552_PL(20)102 Rev. P03;
3552_PL(20)103 Rev. P03;
3552_PL(20)104 Rev. P03;
3552_PL(20)105 Rev. P03;
3552_PL(20)106 Rev. P03;
3552_PL(20)107 Rev. P03;
3552_PL(20)108 Rev. P03;
3552_PL(20)109 Rev. P02;
3552_PL(20)300 Rev. P03;
3552_PL(20)301 Rev. P03;
3552_PL(20)302 Rev. P03;
3552_PL(20)303 Rev. P03;
3552_PL(20)304 Rev. P03;
3552_PL(20)203 Rev. P01;
3552_PL(20)204 Rev. P01;
3552_PL(20)205 Rev. P01;
3552_PL(40)101 Rev. P01;
3552_PL(40)102 Rev. P01;
3552_PL(40)103 Rev. P01;
3552_PL(40)104 Rev. P01;
3552_PL(40)105 Rev. P01;

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 1 (2012), Part 2 (2020) and the London Plan (2021).

3 RES5 **General compliance with supporting documentation**

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

2101320-01 Noise Assessment (Dated July 2021) (Part 1);
2101320-11 Noise Technical Note (Dated 19th October 2021);
20.064-BOSK-00-RP-L-0003 Rev. P01 Landscape Strategy (Dated July 2021);
2101320-05 Delivery & Servicing Management Plan (Dated July 2021);
2101320-06A Car Park Management Plan (Dated August 2021);
2101320-07 Outline Construction Logistics Plan (Dated July 2021);
2101320-10A Utilities & Services Statement (Dated August 2021);
Circular Economy Statement (Dated 30th July 2021);
Daylight, Sunlight and Overshadowing Report V1 (Dated July 2021);
Independent Daylight, Sunlight and Overshadowing Review Response (Dated 15th October 2021);
F10128 Version 01 Detailed Fire Strategy Report (Dated 16th July 2021);
Wind Microclimate (Dated July 2021);
EAS/P1234/C1 Aviation Safeguarding Assessment (Dated 21st July 2021);
2101320-02A Transport Assessment (Dated August 2021);
2101320-04A Travel Plan (Dated August 2021);
2101320-08 Flood Risk Assessment and Drainage Strategy (Dated July 2021);
Energy and Sustainability Statement (Dated 30th July 2021);
2101320-09 Air Quality Assessment (Dated July 2021);
5796/21-01 Aboricultural Survey (Dated April 2021);
Preliminary Ecological Appraisal (Dated May 2021); and
P3284J2275/SL Desk Study / Preliminary Risk Assessment Report (Dated 10th May 2021).

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

REASON
To ensure the development complies with the provisions of the Hillingdon Local Plan Part 1 (2012), Part 2 (2020) and the London Plan (2021).

4 RES7 **Materials**

Prior to commencement of any superstructure works, details of all materials and external surfaces, including details of balconies, shall be submitted to and approved in writing by the Local Planning Authority. Details should include information relating to make, product/type, colour and photographs/images.

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON
To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

5 NONSC **Ground Level Frontages**

Notwithstanding approved plan references 3552_PL(20)203 Rev. P01 and 3552_PL(20)204 Rev. P01, amended details of the hit and miss brick screening and glazing shall be submitted to and approved in writing by the Local Planning Authority. This should include details of further glazing and more decorative art brickwork to provide visual interest.

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON
To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

6 RES9 **Landscape Scheme**

Prior to commencement of above ground works, a landscape scheme shall be submitted to and approved in writing by the Local Planning Authority, in consultation with Heathrow Airport Ltd and Ministry of Defence. 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

N.B. The landscape scheme should demonstrate the provision of defensible space at the first floor podium deck level to mitigate against loss of privacy and prevent direct access to the private amenity space of these units.

2. Details of Hard Landscaping
2.a Refuse Storage
2.b Cycle Storage, demonstrating provision of:
- 239 no. long stay cycle spaces and 6 no. short stay cycle spaces.
2.c Means of enclosure/boundary treatments
2.d Car Parking Layouts, demonstrating provision of 48 no. car parking spaces (including 5 no. wheelchair accessible car parking spaces, 10 no. parking spaces provided with active electric vehicle charging points and 38 no. car parking spaces provided with passive electric vehicle charging infrastructure) and 3 no. motorcycle parking spaces.
2.e Hard Surfacing Materials
2.f External Lighting
2.g Other structures (such as play equipment and furniture)

3. Living Walls and Roofs
3.a Details of the inclusion of the living / green / blue / brown / bio-solar roof and/or living walls.

4. Details of Landscape Maintenance
4.a Landscape Maintenance Schedule for a minimum period of 5 years.
4.b Proposals for the replacement of any tree, shrub, or area of surfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

5. Schedule for Implementation

6. Urban Greening Factor Calculation
6.a The Urban Greening Factor score should be confirmed as part of a stand-alone drawing with calculations attached. This should include:
- A masterplan that is colour-coded according to hard and soft landscape surface cover types; and
- A completed Urban Greening Factor table.

7. Other
7.a Existing and proposed functional services above and below ground
7.b Proposed finishing levels or contours

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

N.B. Any landscaping should be carefully designed to minimise its attractiveness to hazardous species of birds. Your attention is drawn to Advice Note 3, 'Potential Bird Hazards: Amenity Landscaping and Building Design' (available at http://www.aoa.org.uk/policy-campaigns/operations-safety/

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 12, DMHB 14, DMT 2, DMT 6 and DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) and Policies G1, G5 and T6.1 of the London Plan (2021).

7 NONSC **Living/Green Roof/Wall Details**

Prior to commencement of any superstructure works, details of living/green roofs/walls shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Ministry of Defence and Heathrow Airport Ltd. This shall include either:

a) Details and plans identifying the inclusion of living/green roofs/walls, alongside:
i) Method of construction;
ii) Schedule of framework materials;
iii) Schedule of the species to be planted, method of planting, height and spread at planting and growth projections;
iv) An ongoing management and maintenance regime to include irrigation methods and an inspection programme to allow dead or dying plants to be identified and replaced.

The living/green walls shall thereafter be constructed and retained in accordance with the details submitted in perpetuity and shall not be removed or altered without the prior written consent of the Local Planning Authority.

REASON
To ensure that the landscaped areas are retained in accordance with the approved plans in order to preserve and enhance the visual amenities of the locality in compliance with Policies DMHB 11, DMHB 14 and DMEI 1 of the Hillingdon Local Plan: Part 2 (2020).

8 NONSC **Ecological Enhancement Scheme**

Prior to commencement of development (excluding demolition and site clearance), a scheme to protect and enhance the nature conservation interest of the site shall be submitted to and approved in writing by the Local Planning Authority.

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

REASON
In order to encourage a wide diversity of wildlife on the existing semi-natural habitat of the site in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020), Policy G6 of the London Plan (2021) and Paragraph 174 of the National Planning Policy Framework (2021).

9 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 2 (2020).

10 NONSC **Play Area Details**

Prior to commencement of above ground works, details of the play area for children shall be submitted to and approved in writing by the Local Planning Authority. This should include details of accessible play equipment for disabled children, including those with a sensory impairment, or complex multiple disabilities. Thereafter, the play areas shall be provided prior to the occupation of any unit within the development and maintained for this purpose.

REASON
To ensure that the development makes adequate provision of children's play space in accordance with Policies DMHB 19 and DMCI 5 of the Hillingdon Local Plan: Part 2 (2020) and Policies S4 and D5 of the London Plan (2021).

11 NONSC **Accessible External Areas**

Prior to commencement of above ground works, the following shall be submitted to an approved in writing by the Local Planning Authority.
(i) Details of the materials palette, together with a methodology statement, demonstrating that all external areas would be accessible to older and disabled people, including wheelchair users, installed in accordance with the tolerances set out in BS8300:2018.
(ii) Details demonstrating that all amenity areas, including the proposed balconies, are fully accessible to all.

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

REASON
To ensure that accessible amenity space is provided, in accordance with Policies DMHB 12 and DMHB 18 of the Hillingdon Local Plan: Part 2 (2020) and Policy D5 of the London Plan (2021).

12 NONSC **Section M4(2) Accessible Units**

The dwellings hereby approved shall ensure that 90% 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.

REASON
To ensure that sufficient housing stock is provided, in accordance with Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) and Policies D5 and D7 of the London Plan (2021).

13 NONSC **Section M4(3) Accessible Units**

The development hereby approved shall ensure that 2 no. Social Rent units (comprising 3 bedroom 4 person units) are constructed to accord with the technical specifications of Section M4(3)(2)(b) for a Wheelchair Accessible dwelling as set out in Approved Document M to the Building Regulations 2010 (2015 edition).

The development hereby approved shall also ensure that 11 no. 1 bedroom 2 person units are constructed to accord with the technical specifications of Section M4(3)(2)(a) for a Wheelchair Adaptable dwelling as set out in Approved Document M to the Building Regulations 2010 (2015 edition).

REASON
To ensure that an appropriate housing size mix is achieved and maintained, in accordance with Policies D5, D7 and H10 of the London Plan (2021).

14 NONSC **Parking Management and Allocation Plan**

Prior to occupation of the development, a Parking Management and Allocation Plan shall be submitted to and approved in writing by the Local Planning Authority. It shall detail the following:
(i) The arrangements for all parking onsite and include provisions for managing,

monitoring, enforcement and review. All on-site parking spaces shall be solely for the use by future residents of the development hereby approved and shall not be used for any other purpose of leased/sub-let.
(ii) A Parking Design and Management Plan to ensure that an additional 7% of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient.

The approved plan shall be implemented as soon as the development is brought into use and shall remain in place thereafter. Any changes to the plan shall be agreed in writing by the Local Planning Authority.

REASON
To ensure the appropriate operation of the car parks and prevention of inappropriate/informal parking from taking place by users of the site, in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan: Part 2 (2020).

15 NONSC **Delivery and Servicing Plan**

Prior to the occupation of development, details of a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority.

This should be in accordance with Transport for London's Delivery and Servicing Plan Guidance. Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON
To ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T3 and T7 of the London Plan (2021).

16 NONSC **Construction Management and Logistics Plan**

Prior to the commencement of works on site, a Construction Management and Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with relevant stakeholders). This plan shall detail:

(i) The phasing of the works;
(ii) The hours of work;
(iii) On-site plant and equipment;
(iv) Measures to mitigate noise and vibration;
(v) Measures to mitigate impact on air quality;
(vi) Waste management;
(vii) Site transportation and traffic management, including:
  (a) Routing;
  (b) Signage;
  (c) Vehicle types and sizes;
  (d) Hours of arrivals and departures of staff and deliveries (avoiding peaks times of day)
  (e) Frequency of visits;
  (f) Parking of site operative vehicles;
  (g) On-site loading/unloading arrangements; and
  (h) Use of an onsite banksman (if applicable).
(viii) The arrangement for monitoring and responding to complaints relating to demolition and construction; and
(ix) Details of cranes and other tall construction equipment (including the details of obstacle lighting).

This plan should accord with Transport for London's Construction Logistic Planning Guidance and the GLA's 'The Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (July 2014) (or any successor document).

The construction works shall be carried out in strict accordance with the approved plan.

REASON
To safeguard the amenity of surrounding areas and to ensure that the construction works include appropriate efficiency and sustainability measures so as not to compromise the safe and efficient operation of the local highway network and local air quality, in accordance with Policies DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) and Policies D14, SI 1, T4 and T7 of the London Plan (2021). Also, to ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

17 NONSC **Noise**

Prior to the commencement of development, the following shall be submitted to and approved in writing by the Local Planning Authority:

1. A detailed noise survey and assessment, in keeping with the requirements of the ProPG's Stage 2 and the AVO Guide's Level 2 assessments, to confirm the typical external environmental sound levels around the proposed building and within external amenity areas, and the details of the sound insulation scheme(s), and any other control measures (such as to balconies), to meet the relevant internal noise targets within ProPG during both ventilation and overheating conditions, and to minimise levels within amenity areas as far as practicable.

2. A detailed assessment in accordance with the Council's Noise SPD and BS 4142 of the final plant selection and agreement of any required mitigation.

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON
To ensure a satisfactory living environment is achieved, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

18 NONSC **Overheating Strategy**

Prior to commencement of superstructure works, the final Overheating Strategy shall be submitted to and approved in writing by the Local Planning Authority. The submission shall demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
2) minimise internal heat generation through energy efficient design;
3) manage the heat within the building through exposed internal thermal mass and high ceilings;
4) provide passive ventilation;
5) provide mechanical ventilation; and
6) provide active cooling systems.

The approved details shall thereafter be implemented and retained for the lifetime of the development.

REASON
To demonstrate that the final strategy will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy and Policy SI 4 if the London Plan (2021).

19 NONSC **Radar Mitigation Scheme**

(A) No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority (in consultation with the National Air Traffic Services and Heathrow Airport Safeguarding).

(B) No construction work shall be carried out above 10m Above Ground Level (~42m AOD) unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON
To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or NATS En-route PLC, through interference with communication, navigational aids and surveillance equipment, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

20 NONSC **Bird Hazard Management Plan**

Prior to superstructure works commencing, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence and Heathrow Airport Ltd. The submitted plan shall include details of:
- management of any flat/shallow pitched on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'.

The roof terrace and other public access areas are to be provided with lidded bins, and an approved method to maintain the accumulation of waste, to ensure that no food waste is available for the attraction of hazardous birds.

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

REASON
It is necessary to manage the roof in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport, to accord with the requirements of Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020)

21 NONSC **Sustainable Water Management**

Prior to commencement (excluding demolition and site clearance), a scheme for the provision of sustainable water management in line with the approved document reference '2101320-08 Flood Risk Assessment and Drainage Strategy (Dated July 2021)' shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall

clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site by providing information on:

a) Sustainable Drainage features:

i. Surface water discharge - the submitted drainage strategy must identify the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in Policy SI 13 of the London Plan (2021). Where the proposal does not utilise the most sustainable solution, justification must be provided. Any proposal that includes a connection to a private sewer network should provide details of the condition and ownership of the entire drainage route to a public sewer or ordinary watercourse.

ii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that control water at source and provide wider biodiversity, water quality and amenity benefits.

iii. Runoff rates - surface water discharge from the site must be no greater than greenfield runoff rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change.

iv. Drainage calculations - include calculations to demonstrate that the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for events up to and including the critical 1 in 100 plus 40% climate change rainfall event.

v. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and include details on flow paths, depths and velocities. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network.

ii. Include details of the necessary inspection regimes and maintenance frequencies.

c) Minimise water use.

i. incorporate water saving measures and equipment.

ii. provide details of how rain and/or grey water will be recycled and reused in the development.

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 flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1(2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2021); and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

22 NONSC **Contaminated Land**

(i) The development shall not commence until a scheme to deal with contamination has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

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

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

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

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority.

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 of the Hillingdon Local Plan: Part 2 (2020).

23 NONSC **Non-Road Mobile Machinery**

All Non-Road Mobile machinery (NRMM) of net power of 37kW and up to and including 560kW used during the demolition, site preparation and construction phases shall comply

with the emissions standards set out in chapter 4, proposal 4.2.3.a of the London Environment Strategy. Unless it complies with the standard set out in the London Environment Strategy, no NRMM shall be onsite, at any time, whether in use or not, without the prior written consent of the LPA. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register https://nrmm.london/

REASON
To comply with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy, in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 1 of the London Plan (2021), and paragraphs 174 and 186 of the National Planning Policy Framework (2021).

24 NONSC **Low Emission Strategy**

Prior to superstructure works, a Low Emission Strategy (LES) shall be submitted to and approved in writing by the Local Planning Authority. The LES shall address but be not restricted to:
1) secure compliance with the current London Plan (March 2021), and associated Guidance requirements
2) To include in the Travel Plan a clear and effective strategy to encourage users to
a) use public transport;
b) cycle / walk to work where practicable;
c) enter car share schemes;
d) purchase and drive to work zero emission vehicles.

The measures in the agreed scheme shall be maintained throughout the life of the development.

REASON
To reduce the impact on air quality in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part (2020), Policies SI 1 and T4 of the London Plan (2021) and paragraphs 174 and 186 of the National Planning Policy Framework (2021).

25 NONSC **Secured by Design**

The building(s) 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 Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

26 NONSC **Fire Statement**

A) No development shall proceed beyond the steel/timber/concrete superstructure (including roof structure) of any building proposed until the principles of a Fire Statement has been submitted to and approved in writing by the Local Planning Authority. The

statement should detail how the development proposal will function in terms of:
i) the building's construction: methods, products and materials used, including manufacturers' details
ii) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
iii) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
iv) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
v) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
vi) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

B) Prior to occupation of the development, the final comprehensive Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. This should be accompanied by the Building Control Decision Notice or equivalent.

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

REASON
To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021).

27 NONSC **Computational Fluid Dynamics**

Prior to the commencement of works above ground floor level, details of the Computational Fluid Dynamics (CFD) analyses should be submitted to and approved in writing by the Local Planning Authority. This should confirm whether a mechanical smoke ventilation system should be included.

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

REASON
To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021).

28 NONSC **Overlooking Mitigation**

Prior to commencement of above ground works, details of the mitigation measures (such as window louvres) to prevent overlooking between neighbouring habitable rooms and private amenity spaces shall be submitted to and approved in writing by the Local Planning Authority. This should prevent overlooking between the following units: B.01.01 and C.01.05; B.02.01 and C.02.05; B.03.01 and C.03.05; B.04.01 and C.04.05; B.05.01 and C.05.05; C.06.06 and C.06.05; A.07.03 and C.07.05; A.02.10, C.02.02 and C.02.03; A.03.10, C.03.02 and C.03.03; A.04.10, C.04.02 and C.04.03; A.05.10, C.05.02 and C.05.03; A.06.10, C.06.02 and C.06.03.

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

REASON
To prevent overlooking and safeguard the privacy of future occupiers, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

29 RES13 **Obscure Glazing**

The windows facing westwards into the communal corridor/area on the first, second, third, fourth, fifth and sixth of Core A (including units A.01.06, A.01.07, A.01.08, A.02.07, A.02.08, A.02.09, A.03.07, A.03.08, A.03.09, A.04.07, A.04.08, A.04.09, A.05.07, A.05.08, A.05.09, A.06.07, A.06.08 and A.06.09) 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 and safeguard the privacy of future occupiers, in accordance with Policy DMHB 11 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 Part 1 (2012) and Part 2 (2020) 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.

DMAV 1	Safe Operation of Airports
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping

DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
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DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E11	(2021) Skills and opportunities for all
LPP E2	(2021) Providing suitable business space
LPP E3	(2021) Affordable workspace
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G1	(2021) Green infrastructure
LPP G4	(2021) Open space
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP GG3	(2021) Creating a healthy city
LPP GG5	(2021) Growing a good economy
LPP GG6	(2021) Increasing efficiency and resilience
LPP GG4	(2021) Delivering the homes Londoners needs
LPP H1	(2021) Increasing housing supply
LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing

LPP HC1	(2021) Heritage conservation and growth
LPP S4	(2021) Play and informal recreation
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
LPP T6.2	(2021) Office parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
LPP T8	(2021) Aviation
LPP T9	(2021) Funding transport infrastructure through planning
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF4	NPPF 2021 - Decision-Making
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport

3 I70 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 I72 Section 106 Agreement

You are advised that this permission has been granted subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990.

5 I73 Community Infrastructure Levy (CIL) (Granting Consent)

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must

notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

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

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

6

Safety
Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basis Asset Protection Agreement, if required, with a minimum of 3months notice before works start. Initially the outside party should contact assetprotectionwestern@networkrail.co.uk.

Lighting
Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway.

Drainage
Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels - if altered, to be such that water flows away from the railway. Drainage is not to show up on Buried service checks.

7

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7CPlanningEConsult%40Hillingdon.Gov.UK%7C53b4f7c22244901475008d960978437%7Caaacb679c38148fbb320f9d581ee948f%7C0%7C0%7C637647026134378677%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2uMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=mIss%2FDumsmCk3FQX69Mfr9XoDMlOB4Aq31SuOLVwsSE%3D&reserved=0. Please refer to the Wholsesale;

Business customers; Groundwater discharges section.

8

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

9

The outcome of the Computational Fluid Dynamics analysis may not support the inclusion of a mechanical smoke ventilation system, in which case the accommodation units in Cores A, B and C will need to be redesigned. This may impact the layout and density of the building and may affect the number of dwellings.

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises a vacant plot of land, measures 0.36 hectares in area, and is located on the western edge of the Hyde Park Hayes Estate. It is understood that the site formerly served as the staff canteen for the Safeway Headquarters. The pre-existing building was demolished in 2008 and has remained vacant since.

The site is located to the east of the roundabout intersecting Dawley Road, North Hyde Road and Bourne Avenue. Residential properties are located to the north of the site along Keith Road and west along Bourne Avenue, Dawley Road, Waltham Avenue, and Guinness Close. Directly to the north of the Site, is Hyde Park Hayes Building 3 (or HPH3). Application reference 72360/APP/2021/1709 was granted Prior Approval in September 2021 for the change of use from offices to 113 flats. The remainder of the Hyde Park Hayes Estate is sited to the east and comprises offices, industrial units, a hotel and the Hayes Asda Superstore.

Based on the Council's records, the site is subject to potentially contaminated land and forms part of both the Hayes Air Quality Focus Area and Hillingdon Air Quality Management Area. Based on TfL's WebCAT planning tool, the site has a good Public Transport Accessibility Level (PTAL) rating of 4.

A Strategic Industrial Location is located to the north of the application site, alongside the designated Botwell: Thorn EMI Conservation Area, Old Vinyl Factory, Grade II Listed Enterprise House, Locally Listed 'His Master's Voice' building and Locally Listed Thorn/EMI Building.

3.2 Proposed Scheme

This application seeks permission for the re-development of the vacant site to provide a residential development with 131 no. residential units (Use Class C3), comprising 13 no. studio units (10%); 43no. 1-bed 2 person units (33%); 47 no. 2-bed units (36%); and 28 no. 3-bed units (21%). Alongside the units, the development proposes private balconies and shared amenity areas, landscaping and car parking.

Following negotiation, the proposed development also includes on-site affordable housing comprising of 14 no. Social Rent units (equivalent to 15% of the total provision when measured by habitable room), a mix of 4 no. 2-bedroom units and 10 no. 3-bedroom units.

For ease of reference, the proposed development is summarised below.

Block A would provide:
- Residential cycle store, residential bin store, lobby, plant room at ground floor;
- Private market housing, comprising;
  - 13 no. studio units;
  - 15 no. 1 Bed/2P units;
  - 33 no. 2 Bed units; and
  - 8 no. 3 Bed units;

Block B would provide:
- Residential cycle store, residential bin store, lobby at ground floor;
- Affordable housing, comprising;
  - 4 no. 2 Bed units; and
  - 10 no. 3 Bed units;

Block C would provide:
- Residential cycle store, residential bin store, lobby and substation at ground floor;
- Private market housing, comprising;
  - 28 no. 1 Bed units;
  - 10 no. 2 Bed units; and
  - 10 no. 3 Bed units.

The proposed amenity space would comprise the following:
- 944 square metres of private amenity space via balconies;
- 695 square metes of communal amenity space provided via the first floor podium garden;
- 97 square metres of communal amenity space is provided via the semi-indoor space at first floor podium level; and
- 1,390 square metres of communal amenity space provided via the communal roof terraces.
- Total: 3,126 square metres.

The proposed car parking is located at ground floor within an undercroft, comprising 48 no. car parking spaces and including 5 no. accessible car parking spaces.

3.3 Relevant Planning History

40652/APP/2012/2030 Hph 4 Millington Road Hayes

Erection of a four storey building to provide 6,966sq.m of Class B1(a) Office floorspace, provisio of 70 associated car parking spaces at basement level, associated landscaping and ancillary works.

Decision: 29-11-2012 Approved

Comment on Relevant Planning History

Application reference 40652/APP/2012/2030 granted permission in July 2013 for the erection of a four storey building to provide 6,966sq.m of office floorspace, 70 no. associated car parking spaces at basement level and landscaping. This permission was never implemented.

4. Planning Policies and Standards

Development Plan

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

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

The Local Plan: Part 1 - Strategic Policies (2012)
The Local Plan: Part 2 - Development Management Policies (2020)
The Local Plan: Part 2 - Site Allocations and Designations (2020)
The West London Waste Plan (2015)
The London Plan (2021)

Material Considerations

The National Planning Policy Framework (NPPF) (2021) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

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.E1	(2012) Managing the Supply of Employment Land
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.H1	(2012) Housing Growth
PT1.H2	(2012) Affordable Housing
PT1.HE1	(2012) Heritage

Part 2 Policies:

DMAV 1	Safe Operation of Airports
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites

DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
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LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing

LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E11	(2021) Skills and opportunities for all
LPP E2	(2021) Providing suitable business space
LPP E3	(2021) Affordable workspace
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G1	(2021) Green infrastructure
LPP G4	(2021) Open space
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
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LPP GG4	(2021) Delivering the homes Londoners needs
LPP H1	(2021) Increasing housing supply
LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP HC1	(2021) Heritage conservation and growth
LPP S4	(2021) Play and informal recreation
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling

LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
LPP T6.2	(2021) Office parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
LPP T8	(2021) Aviation
LPP T9	(2021) Funding transport infrastructure through planning
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF15	NPPF 2021 - Conserving and enhancing the natural environment
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF4	NPPF 2021 - Decision-Making
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **16th September 2021**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

A site notice was displayed to the front of the site, letters were sent to neighbouring properties and an advert was posted in the local paper. All forms of consultation expired on 17th September 2021. One comment against the proposal has been received but did not explain the objection.

CROSSRAIL SAFEGUARDING:

I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

NETWORK RAIL:

Network Rail have no objections in principle to the above proposals.

Safety
Any works on this land will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets, buried or otherwise and by entering into a Basis Asset Protection Agreement, if required, with a minimum of 3months notice before works start. Initially the outside party should contact assetprotectionwestern@networkrail.co.uk.

Lighting
Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and

colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway.

Drainage
Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels - if altered, to be such that water flows away from the railway. Drainage is not to show up on Buried service checks.

THAMES WATER (summary):

Waste Comments
With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments
With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICES:

On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England's Greater London Archaeological Advisory Service under their consultation criteria.

NATIONAL AIR TRAFFIC SERVICES:

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

NATIONAL AIR TRAFFIC SERVICES FOLLOW-UP:

I refer to the application quoted above and to NATS's previous representation objecting to the Application. Following on from the objection, NATS has proceeded to investigate mitigation measures, which have now been approved by our stakeholders. The delivery of the mitigation work relies on a commercial agreement, and while this is not currently in place, NATS is positively engaged with the Applicant and has no reason to believe this won't be forthcoming in the near future

The mitigation measures comprise a modification to the radar system and are a tangible and common technique entirely within NATS's control to deliver. Accordingly, NATS is satisfied that should the LPA wish to determine the application, it can proceed to do so provided the aviation planning conditions reproduced overleaf, are imposed on any consent.

We would like to take this opportunity to draw attention to the legal obligation of local authorities defined in Planning Circular 2/2003 (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction in the event that any recommendations made by NATS are not accepted.

Standard Aviation Radar Conditions

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

Reason:
In the interests of aircraft safety and the operations of NATS En-route PLC.

2. No construction work shall be carried out above 10m Above Ground Level (~42m AOD) unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

Reason:
In the interests of aircraft safety and the operations of NATS En-route PLC.

For the purpose of conditions 1-2 above;

"Operator" means NATS (En Route) plc, incorporated under the Companies Act (4129273) whose registered office is 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL or such other organisation licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services to the relevant managed area (within the meaning of section 40 of that Act).

"Radar Mitigation Scheme" or "Scheme" means a detailed scheme agreed with the Operator which sets out the measures to be taken to avoid at all times the impact of the development on the NATS H10 Secondary Surveillance radar (SSR) and air traffic management operations of the Operator.

HEATHROW SAFEGAURDING:

I refer to an email received from you, dated Friday 13th August 2021. The development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below.

H10 Radar Mitigation

No development should take place until:
- mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 radar at Heathrow Airport.

Reason

To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through interference with communication, navigational aids and surveillance equipment.
We will need to object to these proposals unless the above-mentioned condition is applied to any planning permission.

We would also like to make the following observation:

Cranes

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

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

LONDON FIRE BRIGADE:

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.

If there are any deviations to Brigade access and facilities then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provisior

HEALTH AND SAFETY EXECUTIVE:

HSE is satisfied with the information provided with the application (including the fire statement).

1. Further comments

1.1. In section 8 of the fire statement, the second paragraph states:

"...In support of extended common corridor travel distances (in excess of 15 m but less than 30 m), the designs will be supported by mechanical ventilation, in turn substantiated via Computational Fluid

Dynamics (CFD) analyses".

The outcome of the CFD analysis may not support the inclusion of a mechanical smoke ventilation system, in which case the accommodation units in cores A, B and C will need to be redesigned. This will impact the layout and density of the building and may affect the number of dwellings.

PLANNING OFFICER COMMENT:

In response to the above, the applicant has confirmed the following:

'As part of the statement and the initial strategy work, and in line with industry practice at concept/RIBA 2 stages, high level specifications of the system configuration (i.e. inlet and outlet routes for ventilation) and siting of the components have been incorporated into the design. This allows the successful development of the CFD analysis at later stages.'

A condition has therefore been added to seek further information under condition no.27:
"Prior to the commencement of works above ground floor level, details of the Computational Fluid Dynamics (CFD) analyses should be submitted to and approved in writing by the Local Planning Authority. This should confirm whether a mechanical smoke ventilation system should be included.

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

REASON
To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021)."

MINISTRY OF DEFENCE:

The application site is approximately 5.4 km from the centre of the runway at RAF Northolt and occupies the statutory aerodrome height and birdstrike safeguarding zones surrounding the aerodrome.

Aerodrome Height Safeguarding Zone

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

Having reviewed the proposals, I can confirm the MOD has no concerns with regards to the height of the proposed development.

Birdstrike Safeguarding Zone

Within this zone, the principal concern of the MOD is the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome.

The principal safeguarding concern of the MOD in relation to this development in the vicinity of RAF Northolt relates to the potential increase in birdstrike risk to aircraft operations as a result of the following:

The proposed building will have flat roofs, including a biodiverse roof with solar panels and more formal landscaped roof terraces with access. The biodiverse roof will include a variety of substrates to create a diversity of habitats, including crushed brick, sand areas and planting. The planting cools

the air around the cells improving their efficiency while the cells create sun and rain shadows which enables different plant types to establish. The cells also provide shelter from weather creating microclimates suitable for nesting hazardous birds such as large gulls and Feral Pigeons. The roof terraces will have access and include planting, play areas, seating and eating areas. The provision of seating and eating areas has the potential to result in spilt or discarded food waste attractive to scavenging birds such as Feral Pigeons, gulls and Starlings. Therefore, lidded bins should be provided and emptied regularly and a comprehensive, results based Bird Hazard Management Plan should be in place to prevent successful breeding of large gulls and Feral Pigeons on the roof space, and to ensure that good housekeeping is adhered to with food waste not being available to hazardous birds.

To address the potential of the development to provide a desirable habitat for hazardous birds, the MOD request that the following conditions are attached to any permission granted:

A condition requiring the submission and approval in writing by the Local Authority, in consultation with the MOD, of a robust, results-based Bird Hazard Management Plan (BHMP) to be approved prior to any development taking place. This BHMP should be secured in perpetuity or until RAF Northolt is no longer operational, and should cover, but not be limited to the construction phase, and the management of flat roofs to prevent the creation of an attractant environment for hazardous birds i.e. large gulls, starlings and feral pigeons.
The roof terrace and other public access areas are to be provided with lidded bins, and an approved method to maintain the accumulation of waste, to ensure that no food waste is available for the attraction of hazardous birds.

Reason
To minimise the potential of the works approved to provide a habitat desirable to hazardous large and/or flocking birds which have the potential to pose a considerable hazard to aviation safety which is exacerbated by the proximity of RAF Northolt.

Crane Management Plan

The MOD recognises that cranes may be used during the construction of tall buildings at this site. These may affect the performance of navigational aids at RAF Northolt and the safety of air traffic. If this development does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures. The MOD requests that a condition such as the one below be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

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

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

Subject to the above design requirements and conditions being implemented as part of any planning permission granted, the MOD maintains no safeguarding objection to this application.

I would be grateful if you could confirm receipt of this letter and confirm that a relevant condition covering the MOD's requirements are included in any consent granted.

It is important to note that the conditions requested in this response are included in any planning permission granted. As per Planning Circular 01/03: Safeguarding Aerodromes, Technical and Military Explosive Storage Areas, if Hillingdon Borough Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made.

TRANSPORT FOR LONDON:

Thank you for consulting TfL on the above application. The site is located on Millington Road, which is a borough road. The closest section of Transport for London Road Network (TLRN) is the Parkway 1.6km east of the site. The closest bus stop is on Bourne Avenue 200m west of the site. The Great Western Railway main line is 700m north-east of the site.

Having reviewed the case documents TfL has the following comments to make:

The development appears to provide Healthy Streets improvements in line with London Plan Policy T2. The proposal will provide and improved public realm making it a more active/vibrant neighbourhood.

Policy T5 of the London Plan sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. The cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Cycle parking facilities should be provided for larger cycles, including adapted cycles for disabled people. The applicant proposes a total of 239 long-stay and 6 short-stay cycle parking which is compliant with Policy T5's minimum requirements.

The proposed development is located in a PTAL 4 area, on a scale of 0 to 6b, where 6b is highest. According to Policy T6.1, new residential development should not exceed up to 0.5 parking spaces per dwelling in areas of PTAL 4. To meet London Plan Policy T6 all parking spaces should have a provision of 20% active Electric Vehicle Charging Points (EVCPs), with passive provision for all remaining spaces. The total parking spaces proposed is 48 which meets policy, 8 of which are disabled parking. According to Policy 6.1 residential development proposals delivering ten or more units must ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available. The development should demonstrate how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. To comply with policy the development should provide 14 disabled parking spaces. A total of 10 EVCPs should be provided to comply with Policy T6.1.

A Delivery and Servicing Management Plan (DSMP) has been submitted. The delivery and servicing strategy should take the form of a Delivery and Servicing Plan (DSP), which should be secured by condition with the Council. Developments should be designed and managed so that deliveries can be received outside of peak hours. According to London Plan Policy T7, the provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. The proposed on-street loading bay along the northern boundary of the site does not meet Policy T7, however it is for the Council to determine the acceptability as it is on a borough road.

A full Construction Logistic Plan (CLP) is to be produced in line with Policy T7 of the London Plan and should be developed in accordance with TfL guidance in a way which reflects the scale and complexities of developments. This document should be secured as part of any permission and must consider the safety of road users in the vicinity of the site. In particular pedestrians and cyclist and to assess any impacts on the road networks. Adequate measures must be provided to ensure safety and construction traffic movements must be planned in advance to minimise impact during the peak network hours.

I trust these comments are helpful in the determination of the application.

Internal Consultees

PLANNING POLICY OFFICER:

Principle of Development

The site is cleared brownfield land and has been vacant for a long period. The plot was formerly the site of the Safeway's headquarters canteen facility, serving the headquarters building located alongside. Its previous use is considered to be ancillary office floorspace. Permission was granted in 2013 for another office building 6,966sq.m, as part of the wider Hyde Park Hayes site. However, this permission was never implemented nor has there been any indication that it is likely to be implemented in the future. There are no planning policy restrictions on the site that would oppose residential development or insist on an alternative use.

The site lies just outside of the Hayes Housing Zone boundary, which is also used to depict the boundary of the Hayes Opportunity Area.

Comprehensive Development

Policy D13 of the London Plan (2021) introduced the Agent of Change concept to the Development Plan, which outlines that the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

To the south of the side is a low-density warehouse and associated car park. As discussed in previous meetings, the applicant has removed windows and balconies from the southern elevation to reduce the likelihood of conflict between new residents and the existing business operations, which is supported. New residents will have the option of accessing the roof terraces for amenity space, which are noted in the Noise Assessment as having lower exposure to existing noise sources than the balconies on the east and west elevations. It is noted that, at the time of writing, no objection to the proposal has been recorded on the back office from any of the existing businesses.

The warehouse and associated car park to the south of the site are considered to form a low-density brownfield site in a sustainable location. Whilst there are no existing plans to redevelop the site, this development potential may be taken up in the future. In line with Policy DMHB 11 of the Local Plan: Part 2 (2020), the proposed development must ensure that the design safeguards the satisfactory re-development of this adjoining site. The applicant has submitted indicative plans for this adjacent site to demonstrate how it could come forward in the future and importantly how the proposed development would not prevent this from happening. It should be noted that these are indicative drawings only and the approval of this application (76655/APP/2021/3039) should not be taken as acceptance that this is the optimal design solution for the adjacent site.

No conflict is therefore raised at this moment in relation to comprehensive development.

Public Open Space

Policy DMCI 4 of the Local Plan: Part 2 (2020) outlines that proposals for major new residential development must make provision for new or enhanced public open space. As discussed in previous meetings, noting the site's size and location, it is considered that this would most appropriately be dealt with via an offsite contribution.

The calculation is determined using the per person formula within the Planning Obligations SPD (2014) and therefore a final sum should be provided after the total number of units has been determined.

Housing Size Mix

Policy H10 of the London Plan (2021) states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes local evidence of need. Policy DMH 2 of Hillingdon Local Plan: Part 2 - Development Management Policies (2020) requires the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. Paragraph 4.6 outlines that there is a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties.

Family housing is defined within the glossary of the London Plan (2021) and outlines it must generally be of a size that has three or more bedrooms. It is worth noting that the Secretary of State directed changes to Policy H10, in order address the need for new family housing, to prevent families from being forced to move outside of London. These changes were incorporated into the final version of the London Plan (2021).

In terms of factors specific to a site, Policy H10 also includes a need to consider, the mix of uses in the scheme, the range of tenures in the scheme and the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.

The proposal is for the following housing size mix:

- 13 no. studio units (10%);
- 43 no. 1-bed 2 person units (33%);
- 6 no. 2-bed 3 person units and 41 no. 2-bed 4 person units (36%); and
- 3 no. 3-bed 4 person units and 25 no. 3-bed 5 person units (21%).

131 Total

The proposal is not overly dominated by one size, with all unit sizes below 50%. The number of studios has also been restricted to 13 (<10%), which is important as these are the least flexible and adaptable unit sizes.

Whilst the proportion of family-sized units is below the proportion outlined within the Council's latest information on housing need, the Council also must take into account the site-specific variables outlined within Policy H10 of the London Plan (2021). The proposed 21% proportion of family units is slightly higher than that recently accepted by the Major Planning Committee on Keith House (27189/APP/2020/2181), which is necessary considering this proposal is further away from the station and town centre.

When the housing size mix policies in the Development Plan are read as a whole, the proportion of family sized units is acceptable.

Infrastructure Assessment

The application appears to be missing an infrastructure assessment. Policy D2 of the London Plan (2021) outlines that an unallocated site that may cause planned infrastructure capacity to be exceeded might need to provide additional infrastructure proportionate to the development. This can

only be identified through an infrastructure assessment during the planning application process. The applicant may be waiting for feedback from internal highway colleagues and TfL before submitting this assessment. They should also make sure they have made contact with the relevant person within the Council's internal School Place Planning Team and the North West London CCG.

PLANNING OFFICER COMMENT:

Document reference 'Infrastructure Impact Assessment (Dated 3rd November 2021)' was submitted in response to the Planning Policy Officer's comments. This is discussed within the main body of the report.

ACCESS OFFICER:

This development for 131 residential units is subject to compliance with London plan policy D1, D5, D7, D12, S4 and T6.1:

1. A convenient drop off point is required for door to door transport services such as Dial a Ride, taxis, and hospital transport.

2. An accessible parking bay should be allocated to every M4(3) wheelchair accessible/adaptable unit.

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

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

5. Details of the materials palette, with particular attention given to the paver types intended for use within the public realm and communal areas. A methodology statement should demonstrate that all materials could be installed in accordance with the tolerances set out in BS8300:2018.

6. In accordance with London Plan policy D5 and D12, where lift access is provided, at least one lift per stair core should be capable of being used as an evacuation lift in compliance with BS-EN-81-76.

7. A landscaping strategy for any intended roof gardens should detail the accessibility provisions, to include pathway surfacing, seating and play space.

8. Details should be required on the accessible play equipment for disabled children, including those with a sensory impairment, or complex multiple disabilities. Provisions could include outdoor sound tubes, colour and lighting canopies, and other play equipment that could stimulate the olfactory senses. Inclusive play is a key requirement of any new residential development.

Conclusion: unacceptable. Revised plans should be submitted, and the Design and Access Statement should be updated accordingly.

ACCESS OFFICER FOLLOW-UP:

1. From the second floor upwards, Core A appears to be separated by a window, meaning that lift access is not possible to all flats. We agreed that this is probably an error, but can you please ask the developer to clarify and submit corrected plans.

2. The drop-off point should be marked on plan.

3. An evacuation lift should be shown on plan within all Cores. The same lift could serve as a firefighting lift, but the evacuation element would need to be specified.

PLANNING OFFICER:

Amended plans have been submitted in accordance with the Access Officer's comments. Relevant detail matters are also to be secured by planning condition if recommended for approval.

TREES AND LANDSCAPING OFFICER:

This site is a cleared brownfield plot located on the western edge of Millington Road. The west edge of the site fronts onto the open space to the south-east of Dawley road round-about. There are occasional young trees around the edges of the plot. The most significant landscape feature is the formal block of mature birch trees which were planted, on Council-owned land, in the public open space. The birches will filter views of the site once built and were planted by the developer in anticipation of the re-development of this HPH site. There are no TPO's or Conservation Area designations affecting the site.

Comment:
The site has been the subject of a number of pre-application meetings, which has resulted in the positive evolution of the scheme. The current proposal reflects the outcome of earlier discussions with the design team. The D&AS confirms that the scheme will provide 131 new homes, significant townscape regeneration, circa 500m2 of new public realm landscaping and improved pedestrian and cycle links. The landscape design concept is described in chapter 6.0 of the D&AS. The landscape objectives include; tree planting within the ground level footpaths, the creation of legible building entrances, improved pedestrian connections, SUDS introduced into the planted areas, a planting buffer around the base of the building, providing visual connection to the sculptural planting on the adjacent site, communal amenity spaces at podium and roof levels and high quality biodiverse roof areas. m At ground level the footprint of the building has been reduced to enable tree-lined footpaths and other soft landscape to enhance the public realm on the north, east and west frontages. The southern boundary presents limited opportunity for enhancement due to its proximity to the adjacent industrial estate. The building is arranged as a three-sided development around a large central landscaped podium at first floor level. The gap in the southern elevation which will permit sunlight into this communal amenity area. Block A fronts onto the north and west elevations. The west elevation comprises a 7-storey block with a communal intensive roof garden for residents use. Block B fronts onto the north-east corner and east elevation. This 8-storey block also features a roof garden for residents. Block A (north-west corner) is a 9 storey block with a biodiverse (extensive) roof.

Recommendation:
No objection subject to conditions RES9 (parts 1,2,3,4,5,6). RES9 part 1 should include details of the topsoil / growing medium specifications and depths.

TREES AND LANDSCAPING OFFICER FOLLOW-UP:

I note that on p.97 of the D&AS the areas of living landscape have been measured, with regard to the Urban Greening Factor. It is noted that the design team are working towards achieving the GLA's residential target of 0.4. A final calculation should be presented with the detailed landscape design, by condition. In the meantime, proposed landscape and biodiversity enhancements should deliver significant improvements on the existing site condition.

NOISE CONSULTANT:

Our main concern is the seemingly lack of confirmation that good acoustic design has been implemented, which, in theory, could influence the layout of the development, rather than something that can be left to the detailed design stage (i.e. post-application). Secondary to this, the topic of agent of change should be covered, which, again, in theory, could influence the layout.

However, we appreciate that the latter is likely to be a low-risk issue, and that there have been, we understand, various pre-app. meetings, with difference layout options presented, whereby there is presumably general justification for, and acceptance of, the proposal layout.

If, therefore, LBH is minded to grant permission based on the current layout, with, no doubt, windows needing to remain closed and mechanical intervention required in some instances regardless of good acoustic design, then we would recommend conditions along the lines of the following (together with any other standard conditions LBH would normally apply):

1. A detailed noise survey and assessment, in keeping with the requirements of the ProPG's Stage 2 and the AVO Guide's Level 2 assessments, to confirm the typical external environmental sound levels around the proposed building and within external amenity areas, and the details of the sound insulation scheme(s), and any other control measures (such as to balconies), to meet the relevant internal noise targets within ProPG during both ventilation and overheating conditions, and to minimise levels within amenity areas as far as practicable.

2. A detailed assessment in accordance with the Council's Noise SPD and BS 4142 of the final plant selection and agreement of any required mitigation.

If, however, LBH is not minded to grant permission based on the observations and opinions within this review, then we recommend that the NA report is updated in keeping with this review.

PLANNING OFFICER COMMENT:

Document reference '2101320-11 Noise Technical Note (Dated 19th October 2021)' was submitted in response to the Noise Consultant comments provided.

This discussion of acoustic design is covered further within the main body of the report.

DAYLIGHT AND SUNLIGHT CONSULTANT:

AY are generally in agreement with the scope and methodology used.

AY consider the overall daylight and sunlight impacts and amenity to HPH3 Millington Road and 1F, 2C, 2D, 2G & 2H Waltham Avenue to be acceptable.

There will be primary habitable rooms that achieve below the recommended targets for internal daylight and sunlight amenity.

The sun on ground overshadowing to neighbouring and proposed amenity areas is considered to be acceptable.

The Proposed Development must balance out a number of constraints and practicalities, and daylight and sunlight amenity should not be considered in isolation as it is important to consider a number of other contextual factors which, combined, influence the wellbeing of residents. Daylight and sunlight is only one factor that influences people's wellbeing and the decision of where to live in an urban location, and should therefore be considered alongside a range of other amenities such as: location, access to public transport, public open space, shops and recreation facilities and improvements to public realm.

It is also noted that national policy seeks to ensure that the planning system encourages more efficient use of land and avoids building homes at low density in accessible urban locations. It also promotes a flexible approach in adopting and applying policy and guidance that could inhibit these objectives, which specifically includes reference to daylight and sunlight.

FLOOD AND WATER MANAGEMENT OFFICER:

An FRA and Drainage Strategy has been submitted produced by Ardent dated July 2021.

The site is in Flood Zone 1 and shown to have some areas identified at Surface Water flood risk.

Groundwater was struck at 2.4 m BGL.

Further revision necessary.

Living roofs and tree pits with permeable paving and tanks are included within the proposals. However Green walls etc to soften the building to the south are not included, and there is limited greening on all sides due to the mass of the proposed building.

The site is 0.360 ha, and current Brownfield Rates is 144.02. It is proposed to restrict run off to 2ls rather than greenfield run off of Q Bar of 0.5ls. Although we agree this is too small a rate 1ls is entirely achievable for such a small site and appropriate storage of more than the 250m3 proposed should be provided to control it to these run off rates. This may be entirely feasible to be provided if paving and tree pits are included in the calculations. The micro drainage calculations must also be updated with the more appropriate CV values.

A survey has been undertaken to show the wider connections even though there is no Thames Water Sewer shown. This must be submitted to Thames Water for addition to their public mapping and accepted by them to provide that this is a public system before the drainage system can be agreed. This is particularly important to provide clarity on the management and maintenance plan required on what the landowner is required to maintain and what will be other bodies responsibility. Figure 2.6 should be provided so it can be read properly and the foul sewer shown in a different colour so the plans can be reviewed in detail. If this cannot be resolved by the time of planning consideration an appropriate condition will be required.

PLANNING OFFICER:

The applicant has responded to the above comments, stating:

"We understand the requirement to reduce the discharge rate from the site to as close to the greenfield runoff rates as is practical. However, consideration has also been given to the self-cleansing velocity of pipes and the size of the hydrobrake orifice plate required to achieve lower discharge rates. Smaller orifice plates and lower velocities would be required, and this would increase the risk of blockages within the network. According to Hydro international's design tool - to achieve a 1l/s discharge rate a 49mm orifice would be required compared to a 70mm orifice for a 2l/s discharge rate. Practically, this is considered significant in terms of the increased risk of the smaller orifice blocking. We therefore consider that 2l/s is appropriate in order to reduce the risk of blockages within the network which could lead to increased flood risk.

The chosen Cv values are based on the recommendations of The Wallingford Procedure which details the methodology for applying the Modified Rational Method for the calculations of urban runoff. The Modified Rational Method uses a single runoff coefficient, C, made up of two individual components, CV and CR. CR is typically taken as around 1.3 and the CV value in MicroDrainage varies depending on the season. This gives a value of around 1 for the combined coefficient of C.

The chosen values are considered appropriate based on the published guidance.

As the sewers serve a number of properties the ownership would have been transferred to Thames Water under the Private Sewers Transfer Regulations in October 2011. It is noted that Thames Water have raised no objection in its response to the planning application. A Build Over Agreement will be applied for as the design of the development progresses."

FLOOD AND WATER MANAGEMENT OFFICER:

No response to the point there is limited greening on all sides due to the mass of the proposed building.

2 Is is a step in the right direction but also considered that other developments are able to achieve 1Is so that is more appropriate to the greenfield run off rates for the site.

Please see quote from HR Wallingford recommendation for updates to the non statutory SuDs standards: confusion has been related to misunderstandings about the appropriate use of the volumetric coefficient, Cv, intended for use with the Modified Rational Method for designing piped networks. This has led to runoff factors of 0.75 or 0.84 being applied to impermeable surfaces. But using these factors in this way leads to an underestimation of runoff volumes during extreme events

Noted that the survey shows multiple sites being served and so should be accepted as adopted by Thames Water and added to their mapping.

PLANNING OFFICER COMMENT:

Public realm planting, a first floor podium deck with greening and green roofs are proposed as part of the scheme. As confirmed within the report, the proposed development achieves an Urban Greening Factor score of 0.48. This exceeds the target score and is considered acceptable.

Flood and water management is addressed further within the main body of the report.

CONSERVATION AND URBAN DESIGN OFFICER:

Background

The application seeks planning permission to re-develop the vacant site at Plot 4, Hyde Park Gate to provide a residential development comprising 131 (C3) residential units, with associated amenity areas, landscaping and car parking.

A number of pre-application discussion have taken place under application 40652/PRC/2021/58 for the re-development of the site to deliver 130 residential (C3) units with associated amenity, podium and parking.

A number of design concerns have been raised throughout the discussions and these concerns have now largely been overcome with subsequent amendments. There still concerns, however, with the treatment of the ground floor which have long lengths of dead inactive frontage.

Site and Surrounds

The site is situated in a prominent location within Hyde Park Hayes close to a large roundabout where Dawley Road, North Hyde Road, Bourne Avenue and Millington Road converge. Hyde Park Hayes is characterised by 5 Office blocks Building 3 of which has prior approval to be converted into residential flats.

The site is located to the south of the Botwell: EMI Conservation Area being separated by the GWR Main Line and North Hyde Road. The conservation area contains a listed building Enterprise House (Grade II) and other locally listed buildings namely the two HMV/EMI Buildings to the southern boundary, Neptune House, Apollo House and Jupiter House on Blythe Road.

The proposals

The scheme proposals will provide 131 new residential units within a collection of three buildings at nine, eight and seven storeys.

Block A which is located on the north and western edges of the site at nine and seven-storeys has 69 residential units. Block B which is located on the northern edge of the site at eight-storeys has 31 residential units and Block C on the eastern edge of the site is eight-storeys with 31 residential units

The buildings are separated into three volumes to create a distinct building that adds variation to the skyline and does not dominate the surrounding context. The stepped roof forms and parapets provide improved amenity terraces that maximize daylight and sunlight. The three blocks are arranged around a raised podium courtyard beneath which sits service areas, cycle stores and a car park.

The proposed building height and bulk are consistent with the recent planning permission for the Yodel site to the north (app27189/APP/2020/2181 (minded for approval) and Building 3 Hyde Park Hayes directly to the north of the site. The height and bulk are also consistent with the recent development on the former Vinyl Factory site north of the railway lines within the Botwell: EMI Conservation Area.

A number of views have been chosen for the Heritage and Townscape Visual Impact Assessment. The views represent a good representation of the most significant locations in which the development would be seen and appreciated. The study helps to demonstrate that the height, bulk and mass of the proposed blocks would be acceptable in townscape terms. The proposed development is also considered to be of a sufficient distance away from the heritage assets that their setting would not be harmed.

The applicant has responded positively to many of the design concerns raised during the pre-application discussion particularly with the close relationship of the development to the Rackspace offices located on the opposite side of the road to the east. The building has now been set back further from the road increasing the separation distance to the office improving the cramped relationship and allowing for the provision of more soft landscaping to the street.

The separation distances between neighbouring buildings now respects the council's requirement for a minimum 21 metre separation distances between habitable rooms. This also takes into consideration the potential future office to residential conversions.

The 21 metre separation distances also appears to have been achieved between the east and western blocks but there is still the potential for overlooking (diagonally) between the north and eastern blocks across the podium which may need to be mitigated against.

The proposed primary facing material of brick is considered acceptable and reflects the local pallet of materials. The architectural language of the blocks is simple but has been carefully considered to incorporate sufficient modelling and detailing (including inset balconies and regular fenestration) that add visual interest to the area. The variation in the design of the three blocks is also welcomed and helps to break up the mass of the development along with the variations in height. This should add visual interest and complement this part of the townscape.

Concerns had been raised with the proposed blank southern elevations of the east and west blocks which would be highly prominent in kinetic views looking north along Dawley Road. The proposed 'cascading' brickwork design produced by protruding and recessed brickwork to the western block is considered acceptable and adds much needed interest. The southern elevation of the eastern block is proposed to be broken up with the horizontal banding of the floor slabs with contrasting brickwork between. This approach would also add visual interest and is considered acceptable.

There are still concerns with the large expanses of 'dead' inactive ground floor frontages to the streets and public footpaths due to the screening of the car park, cycle stores, plant rooms and bin storage etc. The only significant activity is centred around the three entrance lobbies to the flats.

There have been attempts to add visual interest in the form of hit and miss brick screening but there are concerns with this approach as the treatment would give the appearance of a screened car park. There are also concerns that in oblique views the brickwork panels would appear quite solid. It is suggested that further glazing to areas such as the bike storage areas be explored along with more decorative art brickwork to the panels to provide visual interest. More substantial planting could also be introduced to help screen some of the brickwork and help soften the development further.

Conclusion

No objection is raised to the principle of the development. The layout, height, bulk and mass are considered acceptable for the site and would sit comfortably in townscape terms and comparable to other forms of new development in the locality. The architectural language, landscaping and materials are also considered appropriate for the site and area and would not harm the setting of the Botwell: EMI Conservation Area nor the statutory / locally listed buildings associated with the site.

There are concerns, however, with the treatment of the ground floor which has large runs of dead inactive brick frontage. It is considered that further thought should be given to enliven these frontages as the hit and miss brickwork and planting is not considered a sufficient solution.

PLANNING OFFICER COMMENT:

If recommended for approval, a planning condition would secure amended details of the hit and miss brick screening and glazing to the proposed ground level frontages as proposed by condition no.5: "Notwithstanding approved plan references 3552_PL(20)203 Rev. P01 and 3552_PL(20)204 Rev. P01, amended details of the hit and miss brick screening and glazing shall be submitted to and approved in writing by the Local Planning Authority. This should include details of further glazing and more decorative art brickwork to provide visual interest.

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON
To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020)."

AIR QUALITY OFFICER:

Summary of Comments

The proposed development is located within the Hays Focus Area, bringing additional traffic emissions which will add to current likely exceedances. As per the new London Plan and the London Borough of Hillingdon Local Action Plan, developments need to be neutral as minimum and positive

in Focus Areas, contributing to the reduction of emissions in these sensitive areas. The proposed development is not air quality neutral.

The National Planning Policy Framework (NPPF, July 2021) in paragraph 174 (e) requires planning decisions to prevent new and existing development from contributing to unacceptable levels of air pollution; in addition paragraph 186 requires proposals sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Furthermore, development should suitably mitigate air quality impacts on local air quality and be consistent with the local air quality action plan. Its guidance explicitly addresses (Paragraph: 008) mitigation options to ensure new development is appropriate for its location and unacceptable risks are prevented; mitigation options include planning conditions and obligations contributing to funding measures, including those identified in air quality action plans and low emission strategies, designed to offset the impact on air quality arising from new development. The London Plan (March 2021) equally recognises the need to mitigate impacts on air quality by development, requiring development to be air quality positive specially within focus areas, actively contributing to reduce pollutant emissions to the atmosphere. LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area.

Damage Cost and Mitigation Measures

The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach. The total level of mitigation required to the proposed development for traffic emissions is £123,814.

The mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied. Flat rate deductions applied are as follow: Travel Plan (10%), Green Measures (5%). Once all deductions were applied, the remaining value of mitigation due is £105,242.

Therefore, a section 106 agreement with the LAP of £105,242 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

Observations

In addition, two Air Quality conditions are required to develop and implement a Low Emission Strategy and manage construction emissions as required by the Mayor of London. See text below.

Condition Air Quality - Low Emission Strategy

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall address but be not restricted to:
1) secure compliance with the current London Plan (March 2021), and associated Guidance requirements
2) To include in the Travel Plan a clear and effective strategy to encourage users to
a) use public transport;
b) cycle / walk to work where practicable;

c) enter car share schemes;
d) purchase and drive to work zero emission vehicles.

The measures in the agreed scheme shall be maintained throughout the life of the development.

Reason - As the application site is within an Air Quality Management Area, and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2), the London Borough of Hillingdon Air Quality Action Plan 2019-2023, London Plan (2021) policy SI1 and T4, and paragraphs 174 and 186 of the National Planning Policy Framework (2021).

Conditions - Reducing Emissions from Demolition and Construction

A No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

Reason: Compliance with London Plan Policy 7.14 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

B All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.london/."

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy

Context

The proposed development is within an Air Quality Management Area and will affect identified Air Quality Focus Areas. Air Quality Focus Areas are defined by the GLA as areas already suffering from poor air quality where prioritisation of improvements is required. This is supported by:

Local Plan Part 2 Policy DME1 14

A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) Development proposals should, as a minimum:
i) be at least "air quality neutral";
ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
iii) actively contribute towards the continued improvement of air quality, especially within the Air Quality Management Area.

WASTE STRATEGY OFFICER:

Storage Space for Waste and Recycling Bins

If using bulk bins they must be placed on smooth impervious material that is 100 mm thick to withstand the weight. If multiple bins are needed they are better kept in an enclosure. This discourages non-residents from using the bins and also improves the aesthetics of the development. The dimensions of a bulk bin are given below.

Dimensions of Standard Bulk Bin

Bin Size 1,100 litre Eurobin
Height 1,370 mm
Depth 990 mm
Width 1,260 mm

Residents should not to carry their waste more than 30 metres in the horizontal distance from their front door to the bin store. The enclosure or chamber should be large enough to allow clearance of 150mm between each bin and the walls. There should be space in front of the bins to allow residents to easily access the bins when depositing waste. If many multiple bins are used then there should be sufficient space to rotate the bins in between collections. The walls should be made from an impervious, non-combustible material that ideally has a fire resistance of one hour when tested to BS 476-21. If a gate or door is added to the enclosure or chamber it should be metal, hardwood or softwood clad with metal. Ideally it should have a fire resistance of 30 minutes when tested to BS 476-22. The door frame should allow clearance of 150 mm either side of the bin, when it is being pulled out for collection. The door frame should be rebated into the reveals of the opening. There should be a latch or clasp to hold the gate / door open while the collection process takes place. For hygiene arrangements should be made for the cleansing of the bin stores with water and disinfectant. A hose union tap should be installed for the water supply. Drainage should be by means of trapped gully connected to the foul sewer. The floor of the bin store area should have a suitable all (no greater than 1:20) towards the drainage points. If the chambers are inside the building they should have a light. The lighting should be a sealed bulkhead fitting (housings rated to IP65 in BS EN 60529:1992) Internal bin chambers should have appropriate passive ventilators to allow air flow and stop the build up of unpleasant odours. The ventilation needs to be fly and vermin proofed and either near to roof or floor, but away from the windows of dwellings.

Access for collections

- The collectors should not have to cart a 1,100 litre bulk bin more than 10 metres from the point of storage to the collection vehicle.
- The gradient of any path that the bulk bins have to be moved on should ideally be no more than 1:20, with a width of at least 2 metres.
- The surface should be smooth.
- If the storage area is raised above the area where the collection vehicle parks, then a dropped kerb is needed to safely move the bin to level of the collection vehicle.
- The roadway the vehicle parks on should be able to with stand the load of a 26 tonne vehicle.

PLANNING OFFICER:

Revised plans have been submitted by the applicant, incorporating internal doors to access the bin stores, thereby reducing the travel distance for residents. This is considered further within the main body of the report.

HIGHWAYS OFFICER:

Planning permission is sought to develop a vacant site to provide 131no. residential units together

with 48no. car parking spaces, 239no. long stay and 6no. short stay cycle parking spaces. The proposal site is situated just south east of the Dawley Road roundabout within the Hyde Park Hayes estate. Millingdon Road forms the northern site boundary and Dawley Road the western boundary. To the east and south are buildings that also form part of the Hyde Park Hayes estate. The site would be accessed from Millington Road which connects the Dawley Road roundabout to the northwest with Station Road to the east.

Dawley Road is a residential through road connecting the Dawley commercial centre with Hayes. It is lit and subject to a 30mph speed limit with footways on both sides. North Hyde Road forms part of the A347 and runs east/west to the north of the Hyde Park estate. The road benefits from an on-road cycle lane in the westerly direction and a shared cycleway/walkway on its northern edge. The road is lit and subject to a 30mph speed limit.

Millington Road is an unadopted road serving the Hyde Park Hayes estate. It is lit with a 15mph speed limit, and footways on both sides. It has extensive double yellow line parking restrictions to prevent overspill parking and benefits from traffic calming in the form of speed humps. Parking enforcement operated by privately by the estate management team. Site servicing is proposed via a loading bay located on the northern edge of the site

As mentioned above the residential development would provide 48no. car parking spaces (0.37 spaces per unit) of which 5no. would be disabled parking spaces. Twenty percent of the car parking spaces will have active EV charging point provision and the remaining spaces will have passive provision.

Of the 239no. cycle parking spaces 12no. would be for larger bicycles in wider spaced Sheffield type stands, 48no. standard Sheffield Stands, the remaining 179no. spaces would be tiered stands which would be gas assisted to make them easier to lift. Mindful that gas assisted tiered stands will need to be maintained the Highway Authority requires that standard tiered cycle stands are used. This should be secured by way of a planning condition.

Transport for London use as system called PTAL (Public Transport Accessibility Level) to measure access to the public transport network. PTAL assesses walk times to the nearest public transport location taking into account service frequency. The location is then scored between 0 and 6b where 0 is the worst and 6b the best.

According to the Transport for London WebCAT service the application site has a PTAL ranking of 4 indicating access to public transport is good compared to London as a whole suggesting that there are opportunities for some trips to be made to and from the site by modes other than the private car.

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards. For a development of this type, Policy T6.1 allows the development to provide a maximum of 0.75 parking spaces per unit or 98no. in total. The 48no. spaces proposed is therefore in accordance with this policy. Taking into account that the development is in an area with a PTAL ranking of 4 and benefits from good access to shops, services and facilities and public transport, the number of car parking spaces proposed is considered acceptable. However, the Highway Authority require that these spaces are leased as opposed to sold to ensure that the land they take is used as efficiently as possible over the lifetime of the development. This is also a requirement of the published London Plan (2021).

A Transport Assessment has been submitted alongside the planning application, this contains and assessment of the number of trips that the development is forecast to generate. These forecasts have been derived by referring to the TRICS database. The sites used for comparison purposes

have been reviewed by the Highway Authority and are considered appropriate. At the busiest time during the AM Peak the new development would generate 67no. two-way person trips of which 23no. would be journeys by car. This volume of car traffic is considered insignificant and is not anticipated to present a risk to road safety or be detrimental to the free flow of traffic.

The Highway Authority is mindful that the development is car-lite and in the absence of genuine travel choice some residents may resort to owning a car and parking injuriously on-street resulting in parking stress, hindering the free flow of traffic and presenting a risk to road safety. This would be contrary to the published London Plan (2021) Policy T1 Strategic approach to transport, Policy T2 Healthy Streets and Policy T4 Assessing and mitigating transport impacts and Policy T5 Cycling. To guard against this the Highway Authority, require that Travel Plan is produced and submitted for approval. As surety that the Travel Plan will be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a s.106 agreement. It the Travel Plan is successful the bond will be returned.

As required by Transport for London, the Transport Assessment contains an Active Travel Zone assessment (ATZ). An ATZ maps all the potential key destinations around the site and the cycling and walking routes to them, the ATZ should then suggest changes that would make that route safer and more convenient to walk and cycle using the Healthy Streets approach.

The ATZ included in the Transport Assessment has identified the following destinations
- Guinness Close bus stop;
- North Hyde Road (Stop Z) bus stop;
- Hayes & Harlington Station;
- Hayes Town Centre;
- Pinkwell Park;
- Pinkwell Primary School;
- Harlington School; and
- Hayes Medical Centre.

The ATZ then reports that each of these destinations can be accessed along one of 3no. routes. However, the ATZ does not suggest any works along these that could be provided to improve the safety and convenience of trip making by walking or cycling. As this is missing the Highway Authority has carried out its own assessment and identified that dropped kerbs with tactile paving is missing at a number of junctions along these key routes. To improve the safety and convenience with which the residents of the new development can access these destinations the Highway Authority require that the developer enters into a s.106 legal agreement with the Council that includes a Heads of Terms that commits the developer to fund the installation of these missing dropped kerb and tactile paving facilities.

The Highway Authority requires that a Construction Logistics Plan, Service and Delivery Plan are submitted for approval; these documents should be produced based on the guidance produced by TfL tailored to the development and local circumstances. These should be secured by way of suitable planning condition.

Construction Logistic Plans:-
http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf

Service and Delivery Plans:-
http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf

The Highway Authority require that any forthcoming planning approval is subject to the following

conditions and Heads of Terms:-
Conditions
- Ten car parking spaces should be provided with an active electric vehicle charging point with all the remaining spaces having passive provision;
- The two-tier cycle parking racks should be manually operated, this is to reduce the need for maintenance;
- A Construction Logistics Plan should be submitted for approval;
- A Service and Delivery Plan should be submitted for approval;
- A Car Parking Management and Allocation plan should be submitted for approval;
- All car parking spaces are leased as opposed to sold; and
- The applicant will enter into a s.106 legal agreement with the Council to secure the following Heads of Terms.

Heads of Terms
- To guard against the impact of the development displacing parking demands onto nearby unrestricted roads the developer will make a financial contribution up to a maximum of £25,000 to fund the creation of a parking management scheme or isolated parking controls. This money will be held by the Council for a period of 5 years post full occupation, any unused or residual monies would be returned by-way of the above legal mechanism within a mutually agreed timescale.
- A Travel Plan should be provided be submitted for approval. As surety that the Travel Plan will be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a s.106 agreement. It the Travel Plan is successful the bond will be returned;
- The applicant shall enter a s.106 Legal Agreement with the Council obliging them to enter a s.278 Legal Agreement to allow the developer to undertake works on the Council's highway;
- The applicant shall enter a s.106 Legal Agreement with the Council that prohibits new residents from applying to joining any Parking Managements Scheme in the vicinity of the site.
- The applicant shall enter a s.106 Legal Agreement with the Council obliging them to fund the highway works listed in the table below up to a maximum value of £185,838.

Highways Contributions:

- Key Route 1 North Hyde Road Bus Stops, Hayes and Harlington Station, Hayes Town Medical Centre, and Hayes Town Centre - Localised resurfacing with tactile paving and dropped kerbs at 3no. locations - £16,500
- Key Route 2 Guinness Close Bus Stops and Pinkwell Park - Localised resurfacing with tactile paving and dropped kerbs at 5no. locations - £27,500
- Key Route 3 Broad Green Library / Canterbury Tender Care Nursery / Canterbury Road Recreation Ground and Community Centre - Localised resurfacing with tactile paving and dropped kerbs at 14no. locations - £77,000
- Supply and install benches - 6no. at various locations - £12,000
- Street trees - 10no. at various locations - £3,200
- Advisory on-street cycle lane - North Hyde Road - £470
- Millington Road site access - Santander bike hire docking station - £12,000
- Sub total - £148,670
- Preliminaries 5% - £7,434
- Contingencies 10% - £14,867
- Fees 10% - £14,867
- Sub total - £37,168
- Total - £185,838

With the above Planning Conditions and Heads of Terms in place the Highway Authority would be satisfied that the development would be in accordance with the above published London Plan (2021)

policies as well as 'Policy T9 Funding Transport Infrastructure though Planning'. Policy T9 requires that contributions will be sought to 'mitigate impacts from developments, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets approach'.

Subject to all the above there are no Highway objections to this proposal.

PLANNING OFFICER COMMENT:

Following correspondence with the applicant, the following package of measures was agreed.

- Key Route 1:
  - East-West Crossing of Albert Rd (North of North Hyde Rd) - 1 x drop kerb and 2 x tactile paving - £4,750
- Key Route 2:
  - East-West Crossing of Mildred Av (North of Waltham Av) - 2 x drop kerb and 2 x tactile paving - £5,500
- Key Route 3: £19,750
  - North-South Crossing of Waltham Av (East of Mildred Av) - 2 x drop kerb & tactile
  - North-South Crossing of Colbrook Av (East of Mildred Av) - 2 x drop kerb & tactile
  - North-South Crossin of Wentworth Cres (East of Mildred Av) - 2 x tactile (2 no. drop kerb already in place)
  - North-South Crossing of Pinkwell Av (East of Mildred Av) - 1 x drop kerb & 2 x tactile (1 no. drop kerb already in place)
- Improvements to the other two arms of the Waltham Av/Mildred Av junction - £5,500
- Supply and install benches - 1no. on Key Route 1 - £2,000
- Advisory on-street cycle lane - North Hyde Road - £470
- Sub total: £37,970
- Total (including 25% markup): £47,462.50

In view of the overall package of S106 financial contributions, the above is agreed as sufficient and acceptable.

CONTAMINATED LAND OFFICER:

I've reviewed the phase 1 report from Jomas Engineering Environmental dated May 2021.

It is recommended that a phase 2 investigation is conducted to further characterise the site in terms of various contaminants that have been identified as possible contaminants of concern.

Therefore, please impose the following conditions if planning permission is awarded

(i) The development shall not commence until a scheme to deal with contamination has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of the remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

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

recommendations for remedial measures to make the site suitable for the proposed use; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

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

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works for each phase have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority.

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 Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The site is a cleared brownfield land and has been vacant since 2008. The plot was formerly the site of the Safeway's headquarters canteen facility, serving the headquarters building. Its previous use is considered to be ancillary office floorspace. Permission was granted in 2013 for an office building as part of the wider Hyde Park Hayes site. This permission was never implemented nor has there been any indication that it is likely to be implemented in the future. There are no planning policy restrictions on the site that would oppose residential development or insist on an alternative use.

PROVISION OF HOUSING

The Proposed Development will deliver a mix of units and will specifically contribute to the delivery of housing within the borough. The NPPF encourages the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. An important component of this is to ensure that as much use as possible of previously-developed or 'brownfield' land is made.

Policy GG4 (Delivering the homes Londoners need) of the London Plan (2021) states that to create a housing market that works better for all Londoners, those involved in planning and development must:
- ensure that more homes are delivered.
- support the delivery of the strategic target of 50 per cent of all new homes being genuinely

affordable.
- create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.
- establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value

Policy H1 (Housing Growth) of the Hillingdon Local Plan: Plan 1 - Strategic Policies (2012)requires that the borough meets and exceed its minimum strategic dwelling requirement in accordance with other Local Plan policies. The Borough's target was increased as part of the London Plan.

The re-use of this brownfield site for residential dwellings accords with the local and regional planning policies. In addition, the introduction of residential accommodation at this location is considered appropriate in light of the character of the site's surrounding area. No objection is therefore raised to the principle of redevelopment of the site with a residential scheme, subject to compliance with other policies in the development plan.

UNIT MIX

Policy H10 of the London Plan (2021) requires that schemes consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
2) the requirement to deliver mixed and inclusive neighbourhoods
3) the need to deliver a range of unit types at different price points across London
4) the mix of uses in the scheme
5) the range of tenures in the scheme
6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
7) the aim to optimise housing potential on sites
8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock
9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

Policy DMH 2 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. The Council's current information on housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly 3 bedroom properties, as identified in the Strategic Housing Market Assessment 2016. In accordance with Policy DMH 2, developments should demonstrate how the provision of family housing (>3 bedroom units) has been optimised, to address local needs.

The proposed development would provide 131 no. residential units comprising:

- 13 no. studio units (10%);
- 43 no. 1-bed 2 person units (33%);
- 47 no. 2-bed units (36%); and
- 28 no. 3-bed units (21%).

The proportion of three bed units is considered acceptable. As such, the proposal is not considered contrary to Policy DMH 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy H10 of the London Plan (2021).

7.02 Density of the proposed development

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 (2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2.

Paragraph 5.67 of the Hillingdon Local Plan: Part 2 (2020) states that Hillingdon will apply the density standards set out in the London Plan in a flexible manner, according to local circumstances. Large parts of the borough, including many areas in close proximity to town centres, are suburban in character and will lean heavily towards the applications of lower to mid range density scales. Table 5.2 represents a starting point for discussions on the issue of residential density, which should ultimately be determined by a design led approach.

Policy D3 (Optimising Site Capacity through the Design-led Approach) of the London Plan (March 2021) further requires all development to make the best use of land following a design-led approach that optimises the capacity of sites, including site allocations and offers no density matrix figures. The policy further states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

The area surrounding the site is mixed in character. There is an established suburban character with low-rise residential properties located to the north-east, south and west. It is also located within a commercial estate, approximately 560 metres west of Hayes Town Centre and has a good PTAL rating of 4, characteristics more akin to an urban setting.

If suburban/urban density guidelines are applied, Table 5.2 states that the density should be between 200-510 habitable rooms per hectare. The development proposal provides 348 habitable rooms with a site area of 0.36 hectares, equating to a density of 966 habitable rooms per hectare. This exceeds the density matrix attached to Policy DMHB 17.

However, it is noted that these standards are only intended as a guide and density guidance has largely been superseded by the design-led approach taken by Policy D3 in the latest London Plan (March 2021). The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth and existing and planned supporting infrastructure. The policy then goes on to highlight the relevant considerations which would contribute in defining an appropriate density such as site context, amenity considerations etc. These aspects of the proposal are considered in detail within the relevant sections of this report, but it is concluded that overall, the cumulative impacts of the proposal do not suggest that the scheme is of such a density that it is inappropriate in terms of the character and amenity of the local area.

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

ARCHAEOLOGY

Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020) states that the Council, as

advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

The Greater London Archaeological Advisory Service (GLAAS) have been consulted as part of the application process and have confirmed that there is no archaeological interest on the site which would warrant further investigation of the site. All necessary processes have been followed and the proposal would not be considered contrary to Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020).

CONSERVATION AREA AND LISTED BUILDINGS

The application site is located to the south of the designated Botwell: Thorn EMI Conservation Area, Old Vinyl Factory, Grade II Listed Enterprise House, Locally Listed 'His Master's Voice' building and Locally Listed Thorn/EMI Building. Accordingly, the following planning policies are considered:

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 (2020) states:
A) The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:
i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;
iii) it makes a positive contribution to the local character and distinctiveness of the area;
iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

Policy DMHB 2 of the Hillingdon Local Plan: Part 2 (2020) states:
D) Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

Policy DMHB 3 of the Hillingdon Local Plan: Part 2 (2020) states:
A) Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.
B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.

Policy DMHB 4 of the Hillingdon Local Plan: Part 2 (2020) states that new development, including alterations and extensions to existing buildings, within a Conservation Area or on

its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:
A) Require proposals for new development to be of a high quality contextual design.
B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.

The above is supported by Policy HC1 of the London Plan (2021).

The proposed development comprises three main blocks. Block A is located on the north and western edges of the site at 9 and 7-storeys and comprises 69 no. residential units. Block B is located on the northern edge of the site at 8-storeys and comprises 31 no. residential units. Block C is located on the eastern edge of the site, measuring 8-storeys in height with 31 no. residential units.

Given the location of the site which is outside of the conservation area and not directly adjacent to any other heritage assets, and as confirmed by the Council's Conservation and Urban Design Officer, the architectural language, landscaping and materials are considered appropriate for the site and area and would not harm the setting of the local heritage assets which include the Botwell: EMI Conservation Area nor the statutory and locally listed buildings. Accordingly, the proposal is not considered to be contrary to Policies DMHB 1, DMHB 2, DMHB 3 and DMHB 4 of the Hillingdon Local Plan: Part 2 (2020) and Policy HC1 of the London Plan (2021).

7.04 Airport safeguarding

Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020) states:
A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.
B) In consultation with the Airport Operator, the Council will ensure that:
i) areas included in Airport Public Safety zones are protected from development which may lead to an increase in people residing, working or congregating in these zones; and
ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

National Air Traffic Services (NATS) have been consulted and have confirmed they have no objection to the proposed development subject to a planning condition which secures a radar mitigation scheme. The Ministry of Defence have been consulted and have confirmed no objection to the height of the proposed development, subject to securing a bird hazard management plan and construction management strategy by planning condition. Heathrow Airport Safeguarding also raised no objection, subject to securing radar mitigation by planning condition.

Subject to such planning conditions, the proposed development would accord with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

7.05 Impact on the green belt

Not applicable to the consideration of this application which is not within or close to any Green Belt land.

7.07 Impact on the character & appearance of the area

Policy BE 1 of the Hillingdon Local Plan: Part 1 (2012) requires all new development to

improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:
A) All development, including extensions, alterations and new buildings 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.
ii) ensuring the use of high quality building materials and finishes;
iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

The proposed development comprises three main blocks. Block A is located on the north and western edges of the site at 9 and 7-storeys and comprises 69 no. residential units. Block B is located on the northern edge of the site at 8-storeys and comprises 31 no. residential units. Block C is located on the eastern edge of the site, measuring 8-storeys in height with 31 no. residential units.

The proposed separation of the development into three volumes creates a distinct building that adds variation to the skyline and does not dominate the surrounding context. The three blocks are arranged around a raised podium courtyard and the roof forms provide terraces facilitating green roofs and amenity space.

The proposed building height and bulk is consistent with the recent recommendation to approve a part 7, part 9 storey building on the Keith House site (under reference 27189/APP/2020/2181). The proposal is also consistent with the HPH3 building located immediately to the north of the application site. The Heritage and Townscape Visual Impact Assessment submitted demonstrate that the height, bulk and mass of the proposed blocks would be acceptable in townscape terms.

The building has been set back from Millington Road to the East, maintaining a separation distance with the Rackspace office building. This is considered to benefit the design relationship which allows for more landscaping at street level.

The proposed 'cascading' brickwork design produced by protruding and recessed brickwork to the western block is considered acceptable and adds much needed interest. The southern elevation of the eastern block is proposed to be broken up with the horizontal banding of the floor slabs with contrasting brickwork between. This approach would also

add visual interest and is considered acceptable.

The proposed primary facing material of brick is considered acceptable and reflects the local pallet of materials. If recommended for approval, the detail of materials would be secured by planning condition.

There are concerns with the large expanses of 'dead' inactive ground floor frontages to the streets and public footpaths due to the screening of the car park, cycle stores, plant rooms and bin storage. There have been attempts to add visual interest in the form of hit and miss brick screening but there are concerns with this approach as the treatment would give the appearance of a screened car park. There are also concerns that in oblique views the brickwork panels would appear quite solid. It is suggested that further glazing to areas such as the bike storage areas be explored along with more decorative art brickwork to the panels to provide visual interest. More substantial planting could also be introduced to help screen some of the brickwork and help soften the development further. If recommended for approval, further detail of the ground floor would be secured by planning condition.

Subject to planning condition, the proposal would accord with Policy BE 1 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

TALL BUILDINGS

Paragraph 3.9.3 of the London Plan (2021) states that tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. It outlines that Boroughs should define what is a 'tall building' for specific localities, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Paragraph 5.32 of the Local Plan: Part 2 (2020) also outlines that for the purposes of Policy DMHB 10, high buildings and structures are those that are substantially taller than their surroundings, causing a significant change to the skyline. The terms tall and high building appear to be treated synonymously within these sections of the Development Plan.

As buildings within the proposal are taller than 6 storeys or 18 metres, it is necessary to analyse whether they meet the subsequent parts of the definitions held within the Development Plan, namely if the buildings are substantially taller than their surroundings and whether they cause a significant change to the skyline.

In terms of its relationship with its surroundings, the building is located next to a busy roundabout in an immediate area which is characterised by different neighbourhoods, which vary in urban grain. The East of the site comprises of a business park, whilst the West and a portion of the North East are defined by 2 storey streets of housing. The North contains the mixed-use Old Vinyl Factory redevelopment site. Transport infrastructure such as railway lines and wide roads (Dawley Road and North Hyde Road) create a separation distance between the site and the residential neighbourhoods and the Old Vinyl Factory area to the North.

The proposal comprises of buildings of 7 to 9 storeys, which result in contrasting height ratios with existing buildings within 150m of the site, that range from 2 to 9 storeys. Despite the presence of a notable proportion (approximately 50%) of two storey residential buildings within 150m of the site, it is considered that the taller existing non-residential buildings form the more prominent immediate surroundings, due to their proximity to the site and the separation created by Dawley Road and North Hyde Road in particular. The agreed design

for Keith House (27189/ APP/2020/2181) will also result in the inclusion of a 9-storey residential building nearby, which will further increase the height of surrounding buildings. It is therefore not considered that the proposed buildings are substantially taller than their surroundings and cannot be considered a tall building in line with the definitions within the Development Plan.

Notwithstanding the above, analysis was undertaken into the potential for the proposal to cause a significant change to the skyline. It was determined that from mid-range views the proposal would have a strong impact on the skyline and from long-range views the impact would be moderate. Therefore, the scheme would create a significant change to the skyline. However, this change is not deemed to be unacceptable, as outlined within the Urban Design comments elsewhere in this report, which outlines that is would add variation to the skyline and not dominate the surrounding context.

Notwithstanding the above conclusion that it is not a tall building and for the sake of completeness, it is worth covering the remaining elements of tall building policies relating to impacts. Policy DMHB 10 of the Hillingdon Local Plan: Part 2 (2020) states that any proposal for a high building or structure will be required to respond to the local context and satisfy the criteria listed below. It should:
i) be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings;
ii) be located in an area of high public transport accessibility and be fully accessible for all users;
iii) be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views;
iv) achieve high architectural quality and include design innovation. Consideration should be given to its silhouette, so that it provides a positive contribution to the skyline, its design at street level, facing materials and finishes, lighting and night time impact;
v) where residential uses are proposed, include high quality and useable private and communal amenity space and ensure an innovative approach to the provision of open space;
vi) not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces;
vii) be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities;
viii) comply with aviation and navigation requirements and not adversely impact upon telecommunication, television and radio transmission networks; and
ix) demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes.

Policy D9 of the London Plan (2021) also states that development proposals should address the following relevant impacts:

1) visual impacts
a) the views of buildings from short, medium and long-range distances
b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding
c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan

g) buildings should not cause adverse reflected glare
h) buildings should be designed to minimise light pollution from internal and external lightin

2) functional impact
a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants
b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process
c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas
d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building
e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area
f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings

3) environmental impact
a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building
b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions
c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building

4) cumulative impacts
a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retrofitting.

A number of the considerations outlined above are considered elsewhere within the report.

Design and visual impact is considered in Section 07.07 of the report.

Impact on the local highway network is considered in Section 07.10 of the report.

Impact on neighbour amenity is considered in Section 07.08 of the report.

The consideration of airport safeguarding is addressed in Section 07.04 of the report.

Section 07.11 of the report addresses security and Section 07.22 of the report addresses

fire safety.

In terms of the impact of the proposed development on the microclimate, or more specifically wind conditions, a Wind Microclimate Report has been submitted. It is stated that the proposed development is not expected to have any significant impact on the pedestrian level wind conditions within the surrounding area and no significant cumulative effects with the future surrounding developments are expected.

Given the above considerations, whilst the proposal does not meet the definitions of a tall building within the Development Plan, the scheme has been reviewed in line with the specific parts of these policies dealing with impacts and does not show any significant issues.

7.08 Impact on neighbours

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:
B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

Paragraph 5.38 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to ensure that there is sufficient privacy for residents and it will resist proposals where there is an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. A minimum of 21 metres separation distance between windows of habitable rooms will be required to maintain levels of privacy and to prevent the possibility of overlooking. In some locations where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary."

Paragraph 5.40 of the Hillingdon Local Plan: Part 2 (2020) states: "For the purposes of this policy, outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. The Council will expect new development proposals to carefully consider layout and massing in order to ensure development does not result in an increased sense of enclosure and loss of outlook."

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".

The closest residential properties to the application site are located along Dawley Road to the south and Waltham Avenue to the West. It is also noted that the HPH3 building has been granted permission to change the use to residential flats. Specifically, no. 116 Dawley Road is located in excess of 45 metres to the South, no. 97 Dawley Road is located 60 metres to the South-West and nos. 1A to 2M Waltham Avenue are located at least 40 metres to the West. The HPH3 building is also located approximately 21 metres away to the north. Accordingly, the separation distances noted are considered to be suitable in principle.

Following consultation with the Council's Daylight and Sunlight Specialists, it is understood that the overall daylight and sunlight impacts to HPH3 Millington Road and Waltham Avenue

are acceptable. The sun on ground overshadowing to neighbouring and proposed amenity areas is also considered to be acceptable.

With regard to privacy, the separation distances between neighbouring buildings respects the requirement for a minimum 21 metre separation distance between habitable rooms, therefore ensuring that neighbouring residents would not experience any loss of privacy and the proposed development is considered to accord with Policy DMHB 11, part B), of the Hillingdon Local Plan: Part 2 (2020).

7.09 Living conditions for future occupiers

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should:
i) meet or exceed the most up to date internal space standards, as set out in Table 5.1; and
ii) in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

Table 3.1 of London Plan (2021) Policy D6 requires the following:
- One storey 1-bed 1 person unit should provide a minimum of 39 square metres Gross Internal Area (GIA) with a bathroom (or 37 square metres with shower room);
- One storey 1-bed 2 person unit should provide a minimum of 50 square metres GIA;
- One storey 2-bed 3 person unit should provide a minimum of 61 square metres GIA;
- One storey 2-bed 4 person unit should provide a minimum of 70 square metres GIA;
- One storey 3-bed 4 person unit should provide a minimum of 74 square metres GIA; and
- One storey 3-bed 5 person unit should provide a minimum of 86 square metres GIA.

The above is also supported by Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020)

Based on the plans submitted, all of the proposed units meet the minimum space requirements and are provided with adequate outlook from all habitable rooms.

The 21 metre separation distance is mostly achieved between the proposed east and west blocks. However, the windows of the most southerly units in the east (Block A) and west (Block C) blocks would technically be separated by only 20 metres. This is diagonal view rather than direct view which lessens the potential harm to future residents.

The units on the corner of Core B and C also present a slight issue by provided amenity space which can allow from overlooking into habitable rooms. This includes units B.01.01 and C.01.05, B.02.01 and C.02.05, B.03.01 and C.03.05, B.04.01 and C.04.05, B.05.01 and C.05.05, C.06.06 and C.06.05, A.07.03 and C.07.05.

If recommended for approval, a planning condition would secure mitigation measures to prevent overlooking between the units noted above.

The windows facing westwards into the communal corridor/area on the first, second, third, fourth, fifth and sixth of Core A (including units A.01.06, A.01.07, A.01.08, A.02.07, A.02.08, A.02.09, A.03.07, A.03.08, A.03.09, A.04.07, A.04.08, A.04.09, A.05.07, A.05.08, A.05.09, A.06.07, A.06.08 and A.06.09) have the potential to compromise the internal living conditions of future occupiers. If recommended for approval, a planning condition would ensure that these are 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.

As confirmed by the Council's Daylight and Sunlight Consultant, not all rooms achieve adequate daylight and sunlight but it is not considered that the extent of failures warrant a reason for refusal given the urban context of the site. Subject to conditions, the Council's Noise Consultant also confirms that a satisfactory noise environment can be achieved for the proposed habitable rooms.

Given the above, the proposed development complies with Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) and Policy D6 of the London Plan (2021).

PRIVATE AMENITY SPACE

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020) states:
A) All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.2.
B) Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres.
C) Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site.
D) The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

Table 5.2 states that studio and 1-bedroom flats should provide a minimum of 20 square metres of amenity space, 2-bedroom flats should provide a minimum of 25 square metres of amenity space and 3+ bedroom flats should provided a minimum of 30 square metres of amenity space.

Based on a proposal for 56 no. 1-bed units, 47 no. 2-bed units and 28 no. 3-bed units, the proposed development would require 3135 square metres of private amenity space.

Based on the submitted plans, the proposed development would provide the following:
- 944 square metres of private amenity space via balconies;
- 695 square metes of communal amenity space provided via the first floor podium garden;
- 97 square metres of communal amenity space is provided via the semi-indoor space at first floor podium level; and
- 1,390 square metres of communal amenity space provided via the communal roof terraces.

The above provisions total 3,126 square metres of amenity space which falls slightly short of the requirement noted above, equal to 9 square metres. Given the quantity of the shortfall, this is only considered to be a minor conflict with Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020).

PLAY SPACE

Policy S4 of the London Plan (2021) states that residential development proposals should

incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child that:
a) provides a stimulating environment
b) can be accessed safely from the street by children and young people independently
c) forms an integral part of the surrounding neighbourhood
d) incorporates trees and/or other forms of greenery
e) is overlooked to enable passive surveillance
f) is not segregated by tenure
This is supported by the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10m2 of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum, and makes clear that play space should not be segregated by tenure.

Policies DMCI 5 and DMHB 19 of the Hillingdon Local Plan: Part 2 (2020) state:
A) For all major development proposals, the Council will apply Hillingdon's child yields and the London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies that 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds.
B) In areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.
C) The Council will resist the loss of existing play spaces unless:
i) a replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Where this is not possible, development will only be permitted in exceptional circumstances where there are over-riding planning merits to the proposal; and
ii) it can be demonstrated robustly that they are no longer required and that their loss would not lead to a shortfall in overall play provision in the local area.

Paragraph 5.79 of the Hillingdon Local Plan: Part 2 (2020) states that the Council's Open Space Strategy proposes an accessibility standard for children's playgrounds based on a 400 metre travel distance. Specifically, Pinkwell Park is located over 600 metres to the west of the site. Whilst Hillingdon contains approximately 100 equipped playgrounds within parks and other areas of open space, there are areas of deficiency in relation to the accessibility standard. One of the main areas of deficiency is located within Pinkwell, the ward for the application site.

Based on the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', play space requirements is divided into 3 categories;
-age 0-4; door step play/within 100m;
-age 5-11 years; play within 400m of site;
-age 12+ years; play within 800m of site.

Based on the GLA Population Yield Calculator (v3.2), it is anticipated that the following numbers would be yielded from the proposed development:
- 24.7 no. children under the age of 5 years old;
- 18.1 no. children aged 5 to 11 years old; and
- 10.8 no. children aged 12 to 17 years old.

This yields a total of 53.6 children, requiring 536.4 square metres of play space where only the 0-4 age group and 5-11 age group must be provided on site or within 400 metres of the site.

Based on the plans submitted, it can be identified that approximately 224 square metres at first floor level proposed, alongside 90 square metres of play space on the 7th floor roof terrace and 220 square metres of play space on the 8th floor roof terrace. This totals 534 square metres of on site play which exceeds the minimum required for the 0-4 and 5-11 age groups. Lake Farm Park is located approximately 750 metres from the application site and is able to serve the remaining 12-17 years age group. As such, the proposal would not be considered contrary to Policy S4 of the London Plan (2021) and Policies DMCI 5 and DMHB 19 of the Hillingdon Local Plan: Part 2 (2020).

PUBLIC OPEN SPACE

Policy G4 of the London Plan (2021) states that development proposals should create areas of publicly accessible open space, particularly in areas of deficiency, where possible

Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough. The Council will identify new opportunities for open space through an Open Space Strategy. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities.

Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020) states:
A) Proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. Regard will be had to Hillingdon's local recommended standards of provision for all relevant typologies of open space.
B) The provision of major new pieces of open space should contribute positively to Hillingdon's existing networks of green spaces. In major town centre developments, new civic space may be required as an alternative to green open space.
C) Proposals for major new residential development that fail to make provision for new or enhanced open space, or which would result in open space that is inappropriate in type, quality or location, will be resisted.

In support of this, Table 7.1 states the following requirements:
- Quantitiy:
* a borough-wide quantity standard of 6.0 ha of unrestricted open space per 1,000 population.
* a borough-wide quantity standard of 2.0 ha of unrestricted "Recreational" open space per 1,000 population.
- Accessibility - All residents within the borough should have access to:
* A Small or Local (or higher level) open space within 400m of where they live; and
* A District (or higher level) open space within 1,200m of where they live; and where feasible:
* A Metropolitan open space within 3.2 km of where they live.
- Quality:
* All unrestricted open spaces to achieve a minimum quality score of 3 out of 5 by 2026.

Using a 20 square metres per person requirement (based on 2.0 ha per 1,000 people required by London Borough of Hillingdon Open Space Strategy 2011-2026 (July 2011)) and estimated 401 occupants (based on 2.67 average household size in Hillingdon (as of 2011 census) to reflect that they will never be full at the same time), the development should provide 8020 square metres of publicly accessible open space.

The proposed plans indicate that no publicly accessible open space is to be provided. If sufficient publicly accessible open space cannot be accommodated within the site, a financial contribution is required. In the context of the proposed development, it is considered appropriate that contributions are sought for the enhancement of existing public open space in Hayes. Based on the Planning Obligations Supplementary Planning Document (July 2014), the financial contribution required is £175,000 and the applicant has agreed to pay this sum.

Subject to a Section 106 agreement securing a financial contribution in accordance with the above, the proposal would accord with Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020), Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) and Policy G4 of the London Plan (2021).

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The site is located on Millington Road. Based on TfL's WebCAT planning tool, the site has a PTAL rating of 4.

The following planning policies are considered:

Policy DMT 1 of the Hillingdon Local Plan: Part 2 (2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

Policy DMT 2 of the Hillingdon Local Plan: Part 2 (2020) states that proposals must ensure that safe and efficient vehicular access to the highway network is provided, schemes do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents. Also that impacts on local amenity and congestion are minimised and there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and roads.

Policy DMT 6 of the Hillingdon Local Plan: Part 2 (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity.

The National Planning Policy Framework (NPPF) (2021) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This is supported by Policy T4 of the London Plan (2021).

RESIDENTIAL CAR PARKING PROVISION

The proposed development would provide 48 no. car parking spaces for 131 units, equating to 0.37 car parking spaces per unit.

The proposed development should be viewed in the context of Table 10.3 attached to Policy T6.1 of the London Plan (2021) which states that Outer London sites with a PTAL rating of 4 should not exceed a maximum car parking provision of 0.5 spaces per dwelling.

The site is located within an area with a PTAL rating of 4, circa 500 metres (8 min walk) from Hayes and Harlington Station with 4 bus stops within a 400 metre radius. Evidently, the application site is well connected.

MEASURES TO ENCOURAGE SUSTAINABLE TRAVEL

Active Travel Zone Assessment

The Active Travel Zone Assessment submitted identifies a number of areas along key routes which do not fulfil the healthy streets criteria. In connection with this, the following improvements are to be secured by a Section 106 legal agreement if recommended for approval:

- Key Route 1:
  - East-West Crossing of Albert Rd (North of North Hyde Rd) - 1 x drop kerb and 2 x tactile paving - £4,750
- Key Route 2:
  - East-West Crossing of Mildred Av (North of Waltham Av) - 2 x drop kerb and 2 x tactile paving - £5,500
- Key Route 3: £19,750
  - North-South Crossing of Waltham Av (East of Mildred Av) - 2 x drop kerb & tactile
  - North-South Crossing of Colbrook Av (East of Mildred Av) - 2 x drop kerb & tactile
  - North-South Crossin of Wentworth Cres (East of Mildred Av) - 2 x tactile (2 no. drop kerb already in place)
  - North-South Crossing of Pinkwell Av (East of Mildred Av) - 1 x drop kerb & 2 x tactile (1 no. drop kerb already in place)
- Improvements to the other two arms of the Waltham Av/Mildred Av junction - £5,500
- Supply and install benches - 1no. on Key Route 1 - £2,000
- Advisory on-street cycle lane - North Hyde Road - £470
- Sub total: £37,970
- Total (including 25% markup): £47,462.50

Parking Management Scheme Review

It is considered reasonable and proportionate to secure a financial contribution towards the review of local roads; including but not limited to Bourne Avenue, Guinness Close, Windsor Gardens, Waltham Avenue and Colbrook Avenue; with a view to implementing a Parking Management Scheme. If recommended for approval, this would be secured by Section 106 legal agreement.

Restriction on Parking Permits

If recommended for approval, the residents of this development will not to be eligible for parking permits within the Parking Management Areas and Council car parks in the vicinity of the site.

Cycle Parking Provision

Table 10.2 of Policy T5 of the of the London Plan (2021) states that residential developments should provide the following long-stay cycle spaces:

- 1 no. space per studio or 1 person 1 bedroom dwelling
- 1.5 no. spaces per 2 person 1 bedroom dwelling
- 2 no. spaces per all other dwellings

In addition, residential developments should provide the following short-stay cycle spaces:
- 5 to 40 dwellings: 2 spaces
- thereafter: 1 space per 40 dwellings

Based on the proposed 13 no. studio units, 43 no. 1-bed 2 person units and 75 no. 2+ bedroom units, 228 no. long stay cycle parking spaces and 5 no. short stay cycle parking spaces should be provided. A total of 239 no. long stay and 6 no. short stay spaces are proposed. If recommended for approval, this would be secured by condition.

Evidently, the proposed development commits to a significant number of cycle parking spaces in aid of encouraging a shift towards more sustainable travel modes.

Travel Plan

If recommended for approval, a full Travel Plan is to be secured alongside a £20,000 Travel Plan bond to ensure that it is delivered.

Sustainable Travel Summary

Subject to securing the measures set out above, the level of on-site car parking is considered to be acceptable.

ACCESSIBLE PARKING

Policy T6.1 of the London Plan (2021) states:
G) Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:
1) ensure that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset
2) demonstrate as part of the Parking Design and Management Plan, how an additional 7% of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.

The proposed development would provide 5 no. designated disabled persons parking bays and exceeds the 3% requirement (which is equal to 4 no. spaces). Plan reference '3552_PL(20)120' has also been submitted by the applicant and demonstrates that 9 no. additional spaces (equal to 7%) could be provided within the proposed car park, to total 13 no. spaces. Subject to a planning condition securing a Parking Design and Management Plan, this is considered acceptable.

ELECTRICAL VEHICLE CHARING POINTS

Policy T6.1 of the of the London Plan (2021) states that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces. If recommended for approval, this would be secured by condition.

TRIP GENERATION

The Transport Assessment confirms that at the busiest time during the AM Peak the proposed development would generate 67 no. two-way person trips of which 23no. would

be journeys by car. This volume of car traffic is considered insignificant and is not anticipated to present a risk to road safety or be detrimental to the free flow of traffic.

SERVICING AND DELIVERY

If recommended for approval, a finalised Servicing and Delivery Plan would be secured by condition.

CONSTRUCTION LOGISTICS PLAN

If recommended for approval, a finalised Construction Logistics Plan would be secured by condition.

SUMMARY

If recommended for approval, a number of planning obligations would be secured by Section 106 legal agreement and would contribute to the mitigation of impacts that may arise from the proposed use. This includes the following:
- Highways Works: Section 278 agreement to secure highway works.
- Highways Improvements: A financial contribution amounting to £47,462.50 shall be paid to the Council for the local highway improvements.
- Parking Management Scheme Review: A financial contribution amounting to £25,000 shall be paid to the Council for the review of local roads with a view to implementing a Parking Management Scheme.
- Parking Permit Restrictions: The residents of this development will not to be eligible for parking permits within the Parking Management Areas and Council car parks in the vicinity of the site.
- Travel Plan: A full Travel Plan is to be secured alongside a £20,000 Travel Plan bond to ensure that it is delivered.

Subject to the planning obligations and conditions noted above, the proposed development would accord with Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part 2 (2020), Policy T4 of the London Plan (2021) and the NPPF (2021).

7.11 Urban design, access and security

URBAN DESIGN

Please see Section 07.07 of the report.

COMPREHENSIVE DEVELOPMENT

Policy D13 of the London Plan (2021) outlines the Agent of Change principle, stating that the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses lies with the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. This is considered further in Section 07.18 of the report.

Policy DMHB 11, part C), of the Hillingdon Local Plan: Part 2 (2020) states that development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential.

A low-density warehouse and car park is located to the south of the site. This is considered

to form a low-density brownfield site in a sustainable location. In order to safeguard the development potential of this site, the proposed development has not included windows or balconies on the southern elevation. Whilst safeguarding the development potential of the site, it also reduces the likelihood of conflict between new residents and the existing business operations.

No conflict is therefore raised in relation to comprehensive development.

ACCESS

Please see Section 07.12 of the report.

SECURITY

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:
i) providing entrances in visible, safe and accessible locations;
ii) maximising natural surveillance;
iii) ensuring adequate defensible space is provided;
iv) providing clear delineations between public and private spaces; and
v) providing appropriate lighting and CCTV.

This is supported by Policy D11 of the London Plan (2021).

If recommended for approval, a secure by design condition would be attached to achieve appropriate accreditation. Subject to such a condition, the proposal would accord with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

7.12 Disabled access

Policy D5 of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design. They should:
1) be designed taking into account London's diverse population;
2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;
3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment;
4) be able to be entered, used and exited safely, easily and with dignity for all; and
5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

Policy D7 of the London Plan (2021) states:
A) To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:
1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3)

'wheelchair user dwellings'
2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

It is understood that all unit layouts have been designed to meet Part M4(2) and 10% of units would meet Part M4(3) standard. This equates to 13 no. wheelchair accessible units, all of which are one bedroom two person units. These are all accessible via two lifts, including an evacuation lift.

If recommended for approval, details to demonstrate that all external areas and amenity areas would be accessible to older and disabled people, including wheelchair users, would be secured by planning condition. Details of accessible play equipment for disabled children, including those with a sensory impairment, or complex multiple disabilities, would also be secured by condition.

Subject to condition, the proposal would accord with Policies D5 and D7 of the London Plan (2021).

7.13 Provision of affordable & special needs housing

Policy H2 of the Hillingdon Local Plan: Part 1 (2012) states that housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan: Part 1. For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.

Policy H5 of the London Plan (2021) requires that the threshold level of affordable housing on gross residential development is initially set at 35%. Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020) supports this and states that affordable housing should be delivered with the tenure split 70% Social/Affordable Rent and 30% Intermediate. In exceptional circumstances, where on-site provision of affordable housing cannot be delivered and as a last resort, a financial contribution will be required to provide off-site affordable housing on other sites which may be more appropriate or beneficial in meeting the Borough's identified affordable housing needs.

The Financial Viability Appraisal submitted has been independently assessed by the Council's external consultants and following negotiations with the applicant, parameters have been agreed in order to allow the LPA to understand the viability of the proposed development and the associated number of affordable housing units which can be provided on-site.

Consequently, the proposed development would provide 14 no. Social Rent units (equivalent to 15% of the total provision when measured by habitable room) on the first, second, third, fourth and fifth floors of Core B, comprising 4 no. 2-bedroom units and 10 no. 3-bedroom units. An independent review of the schemes viability has determined to the satisfaction of officers that this is the maximum viable affordable housing provision that the scheme can deliver on-site with the tenure that best meets the needs of the Borough. This is notably supported by the Council's Housing Team.

In addition, the proposed affordable housing would be built to the same standards as the private housing. The proposed Core B would exhibit the same design and qualities of Cores A and C. The affordable housing would also share the same communal amenity

spaces, including the first floor podium deck and the roof terraces.

If recommended for approval, the affordable housing provision proposed would be secured by a Section 106 legal agreement with an Early and Late Stage Viability Review mechanism imposed to secure further affordable housing units if the viability of the scheme improves. As such, the proposed development accords with Policy H5 of the London Plan (2021), Policy H2 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020).

7.14 Trees, landscaping and Ecology

TREES AND LANDSSCAPING

Policy G1 of the London Plan (2021) states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) states that all development proposals are required to comply with the following:
i) All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and
ii) Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) states:
A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The application does include some tree planting on the edges of the plot. The most significant landscape feature is the formal block of mature birch trees which were planted, on Council-owned land, in the public open space. There are no TPO's or Conservation Area designations affecting the site.

At ground level the footprint of the building has been reduced to enable tree-lined footpaths and other soft landscape to enhance the public realm on the north, east and west frontages. The building is arranged as a three-sided development around a large central landscaped podium at first floor level. All blocks of the development feature green roofs in the form of amenity space or designated biodiverse roof with PV panels.

If recommended for approval, a detailed landscape scheme would be secured by planning condition. Subject to such a condition, the proposal would accord with Policy G1 of the London Plan (2021) and Policies DMEI 1, DMHB 14 and DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

URBAN GREENING FACTOR

Policy G5 of the London Plan (2021) states:
a. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
b. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.

The information submitted confirms that the proposed development achieves a score of 0.48 which exceeds the target score. If recommended for approval, the detail of this would be secured by condition.

ECOLOGY

Paragraph 174 of the NPPF (2021) states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is supported by Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

The re-development of the site would not result in any indirect ecological impacts that would be considered significant. The submitted Preliminary Ecological Appraisal (May 2021) recommends tree planting, the introduction of bird boxes, raised beds and nectar-rich planters. If recommended for approval, an ecological enhancement condition would secure the appropriate protection and enhancement of ecological value within the site. Subject to this condition, the proposal is considered to accord with the NPPF (2021), Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020

7.15 Sustainable waste management

Policy EM11 of the Local Plan: Part 1 (2012) requires all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:
D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

Internal bin storage is proposed at the ground floor level next to Cores A, B and C. Cores A and B can be accessed by a service vehicle via the use of a lay-by and Core C can be accessed by a service vehicle which is able to stop outside the Core C entrance. Residents should not carry their waste more than 30 metres from their front door to bin store. Further, the collectors should not have to cart the bins more than 10 metres from the point of storage to the collection vehicle. Amended plans have been submitted to incorporate internal access to the bin stores by residents. This achieves the required travel distances for residents and refuse collection. Accordingly, the proposed development is

considered to accord with Policy EM11 of the Local Plan: Part 1 (2012) and Policy DMHB 11, part D), of the Hillingdon Local Plan: Part 2 (2020).

7.16 Renewable energy / Sustainability

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 (2020) requires that:
A) All developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets;
B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved;
C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an off-site contribution to make up for the shortfall. The contribution will be sought at a flat rate at of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

This is supported by Policy EM1 of the Hillingdon Local Plan: Part 1 (2012).

Policy SI 2 of the London Plan (2021) states that major development should be net zero-carbon, in accordance with the energy hierarchy: Be lean: use less energy and manage demand during operation; Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly; Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and Be seen: monitor, verify and report on energy performance.

The Energy Strategy for the development is to utilise a centralised air source heath pump system and PV panels. Following the energy hierarchy, passive design measures, energy efficient equipment have shown an improvement of 63.5% improvement over Part L for the development.

Given that there is a zero-carbon requirement for the residential development, the applicant has made a commitment to ensure the shortfall is met via payment to the Hillingdon's carbon offset fund. If recommended for approval, a Section 106 legal obligation will secure £147,983 at a cost of £95 per tonne of carbon over a 30-year period.

Subject to the condition and Section 106 planning obligation, the proposed development would not be considered contrary to Policy SI 2 of the London Plan (2021), Policy EM1 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 2 of the Hillingdon Local Plan: Part 2 (2020).

OVERHEATING

Policy SI 4 of the London Plan (2021) states:
A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
2) minimise internal heat generation through energy efficient design;
3) manage the heat within the building through exposed internal thermal mass and high ceilings;
4) provide passive ventilation;

5) provide mechanical ventilation; and
6) provide active cooling systems.

As set out in the Energy and Sustainability Statement, the London Plan overheating checklist has been used to assess the risk of overheating in the flats. Accordingly, the risk of over solar overheating is minimised. Whilst Mechanical Ventilation with Heat Recovery is provided to allow for ventilation during times when windows need to remain closed due to external elements such as noise or air quality, there is also a natural ventilation strategy possible and a number of units have dual aspect to allow for cross ventilation. Windows are specified to incorporate low emissivity coatings to limit overheating while ensuring adequate daylight. External shading has been designed into the facades. Deck corridors between units are open and naturally ventilated minimising the chances of facing units overheating.

If recommended for approval, the final details of the Overheating Strategy shall be secured by condition. Subject to such a condition, the proposal would accord with Policy SI 4 of the London Plan (2021).

7.17 Flooding or Drainage Issues

Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision of flood risk and surface water flooding mitigation will be refused.

The proposed drainage strategy incorporates green infrastructure and SuDS features into the proposed drainage strategy. It has been agreed that a condition would secure the final detail of the drainage strategy. Subject to such a condition, the proposed development is not considered contrary to Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policies SI 12 and SI 13 of the London Plan (2021).

7.18 Noise or Air Quality Issues

NOISE

Policy D13 of the London Plan (2021) places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

Policy D14 of the London Plan (2021) states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
1) avoiding significant adverse noise impacts on health and quality of life
2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
4) improving and enhancing the acoustic environment and promoting appropriate

soundscapes (including Quiet Areas and spaces of relative tranquillity)
5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

This is supported by Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

Regarding the agent of change principle, it is noted that the nearest commercial units to the site are EMC Advertising Gifts and Geiger UK. Other buildings in the immediate vicinity are either occupied as offices, a car park or are to be converted into residential flats. These are not considered to generate noise levels which will have an impact at the site. The primary noise source in the immediate noise environment is the surrounding road network. Taking into consideration the design constraints for the site, it is considered that acoustic design has been considered as part of the planning submission however a detailed noise survey and assessment and detailed assessment of the final plant selection and mitigation would be secured by planning condition. Subject to condition, the proposal would accord with Policies D13 and D14 of the London Plan (2021), Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

AIR QUALITY

Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Policy SI 1 of the London Plan (2021) further supports this.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) states:
A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.
B) Development proposals should, as a minimum:
i) be at least "air quality neutral";
ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

The application site is located within the Hillingdon Air Quality Management Area and Hayes Air Quality Focus Area. The proposed development, due to its size and location, will add to current exceedances of the nitrogen dioxide annual mean limit value within this sensitive area as a result of traffic emissions. The proposal is also not air quality neutral in terms of traffic emissions.

As advised by the Council's Air Quality Officer, the level of mitigation required for traffic

emissions associated with the proposed development is £105,242. Planning conditions pertaining to an Air Quality Emission and Exposure Mitigation Plan and control of Non-Road Mobile Machinery are also required.

Subject to such planning obligations and conditions, the proposal is not considered contrary to Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) and Policy SI 1 of the London Plan (2021).

7.19 Comments on Public Consultations

Please see Section 06.1 of the report.

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states:
A) 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. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).
B) Planning obligations will be sought on a scheme-by-scheme basis:
i) to secure the provision of affordable housing in relation to residential development schemes;
ii) where a development has infrastructure needs that are not addressed through CIL; and
iii) to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.
C) Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

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.

On the basis of the NPPF and the Community Infrastructure Levy Regulation 2010, it is only considered reasonable to request planning obligations relating to the following:

i. Affordable Housing: Planning obligation for an on-site provision of 14 no. Social Rent units, comprising 4 no. 2-bedroom units and 10 no. 3-bedroom units. This shall include an Early and Late Stage Viability Review mechanism as defined by Policy H5 of the London Plan (2021).

ii. Air Quality Contribution: A financial contribution amounting to £105,242 shall be paid to address the air quality impacts of the proposed development.

iii. Carbon Offset Contribution: A financial contribution amounting to £147,983 shall be paid to the Council's carbon offset fund.

iv. Public Open Space: A financial contribution amounting to £175,000 shall be paid to the Council for the enhancement of existing public open space within the Council's administrative area.

v. Highways Works: Section 278 agreement to secure highway works.

vi. Local Highways Improvements: A financial contribution amounting to £47,462.50 shall be paid to the Council for the local highway improvements.

vii. Parking Management Scheme Review: A financial contribution amounting to £25,000 shall be paid to the Council for the review of local roads, with a view to implementing a Parking Management Scheme. This money will be held by the Council for a period of 5 years from final completion and any unused or residual monies after this date would be returned.

viii. Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such as matters as: targets for sustainable travel arrangements; effective measures for the ongoing monitoring of the Travel Plan; and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured.

ix. Parking Permits: The residents of this development will not to be eligible for parking permits within the Parking Management Areas and Council car parks in the vicinity of the site, apart from Blue Badge holders and a charge made against the site to ensure the future buyers are aware of the parking restrictions.

x. Employment Strategy and Construction Training: Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority. A financial contribution will only be accepted in exceptional circumstances.

xi. HUDU Health Contribution: A financial contribution amounting to £20,944 shall be paid to the Council for the enhancement of health infrastructure provision.

xii. Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions.

COMMUNITY INFRASTRUCTURE LEVY (CIL):

The scheme would also be liable for payments under the Community Infrastructure Levy.

Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m2 or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon (LBH) is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

In addition the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy (Hillingdon CIL), which came into effect on 1st August 2014. The liability payable is equal to £95 per square metre for residential development (Use Class C3).

The CIL liability is estimated as follows:

Hillingdon CIL: £1,869,668.54
Mayoral CIL: £848,060.18

7.21 Expediency of enforcement action

Not applicable to the consideration of this application.

7.22 Other Issues

CONTAMINATED LAND

Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states that:
A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.
B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.
C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.
D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

The Council's Contamination Officer considers that the proposal is acceptable subject to a planning condition requiring details of a remediation strategy. Subject to such a condition, the proposal is not considered contrary to Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

FIRE SAFETY

Policy D12 of the London Plan (2021) states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:
1) the building's construction: methods, products and materials used, including manufacturers' details
2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and

the ongoing maintenance and monitoring of these
5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

The Health and Safety Executive have been consulted on this application and have confirmed that the information submitted is satisfactory. It is noted that the outcome of the Computational Fluid Dynamics analysis may not support the inclusion of a mechanical smoke ventilation system, in which case the accommodation units in cores A, B and C will need to be redesigned. This will impact the layout and density of the building and may affect the number of dwellings. This is invariably a risk for the applicant, however, as there are solutions if a problem arises, it is not warranted to recommend refusal and the HSE have not raised a formal objection.

The London Fire Brigade have also been consulted and confirmed no comment. The Health and Safety Executive have also confirmed that they are satisfied with the Fire Statement submitted.

A final fire strategy will be secured by condition if recommended for approval and will need to be assessed by a suitably qualified Fire Safety Specialist. The discharge of condition application should be accompanied by a Building Control application. Subject to such a condition, the proposal would accord with Policy D12 of the London Plan (2021).

HEALTH

Paragraph 92 of the NPPF (2021) states that planning decisions should aim to achieve healthy, inclusive and safe places which:
c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.

Paragraph 93 of the NPPF (2021) states that planning decisions should:
b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

Policy GG3 of the London Plan (2021) states that in order to improve Londoners' health and reduce health inequalities, those involved in planning and development must:
a) ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities
b) assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities
c) plan for appropriate health and care infrastructure to address the needs of London's changing and growing population

Policy CI1 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations.

Paragraph 7.2 of the Hillingdon Local Plan: Part 2 (2020) also states that there is a particularly pressing need in the Borough for additional health care facilities to address

higher than expected birth rates and an increase in the older population.

The floorspace occupied by affordable housing is not liable to Community Infrastructure Levy. Accordingly, the HUDU Planning Contributions Model has been used to assess the health service requirements and cost impacts of the development. A financial contribution amounting to £20,944 has been calculated and would be secured as part of the Section 106 legal agreement if recommended for approval.

INFRASTRUCTURE ASSESSMENT

Policy D2 of the London Plan (2021) states that an unallocated site that may cause planned infrastructure capacity to be exceeded might need to provide additional infrastructure proportionate to the development. This can only be identified through an infrastructure assessment during the planning application process.

An Infrastructure Impact Assessment was submitted by the applicant during the application process. In respect of the impact upon infrastructure, the proposal will generate Hillingdon and Mayoral CIL contributions to fund the provision of infrastructure. A comprehensive set of planning obligations are also to be secured by a Section 106 legal agreement if recommended for approval. Accordingly, the proposal is not considered to be contrary to Policy D2 of the London Plan (2021).

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

In conclusion, the proposed re-development of the vacant site to provide a residential development comprising 131 no. residential units (Use Class C3) is considered acceptable in principle.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

It is agreed that the affordable housing offer is the maximum viable affordable housing provision possible with the tenure that best meets the needs of the Borough which is a notable benefit of the scheme. The proposed scale and mass of the development is considered to be appropriate within the context of the site. The quantity of private amenity space proposed would fall slightly short of the local plan standards and represents a minor policy conflict which is only afforded limited negative weight. Sufficient play space would, however, be provided, alongside a contribution for public open space enhancement within the Council's administrative area. The parking provision proposed is considered to be acceptable and the agreed local highway improvement works would complement the intensified use of the site and would be a benefit of the scheme. The proposed development is also considered acceptable with regard to its impact on neighbour amenity, access, security, landscaping, ecology, refuse, energy, flooding, noise and contaminated land.

In summary, the proposed development is considered to be a suitable use of the site. Although the proposed development would technically conflict with local plan private

amenity space standards, the conflict is considered to be minor and would be outweighed by the planning gain secured as part of a recommendation for approval. Material considerations therefore indicate that the benefits of the scheme outweigh the minor policy conflict with regard to private amenity space and should be granted planning permission,

Subject to planning conditions and a Section 106 legal agreement, this application is recommended for approval.

11. Reference Documents

National Planning Policy Framework (July 2021)
The London Plan (March 2021)
Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)
Hillingdon Local Plan: Part 2 - Site Allocations and Designations (January 2020)
Accessible Hillingdon Supplementary Planning Document (September 2017)
Planning Obligations Supplementary Planning Document (July 2014)

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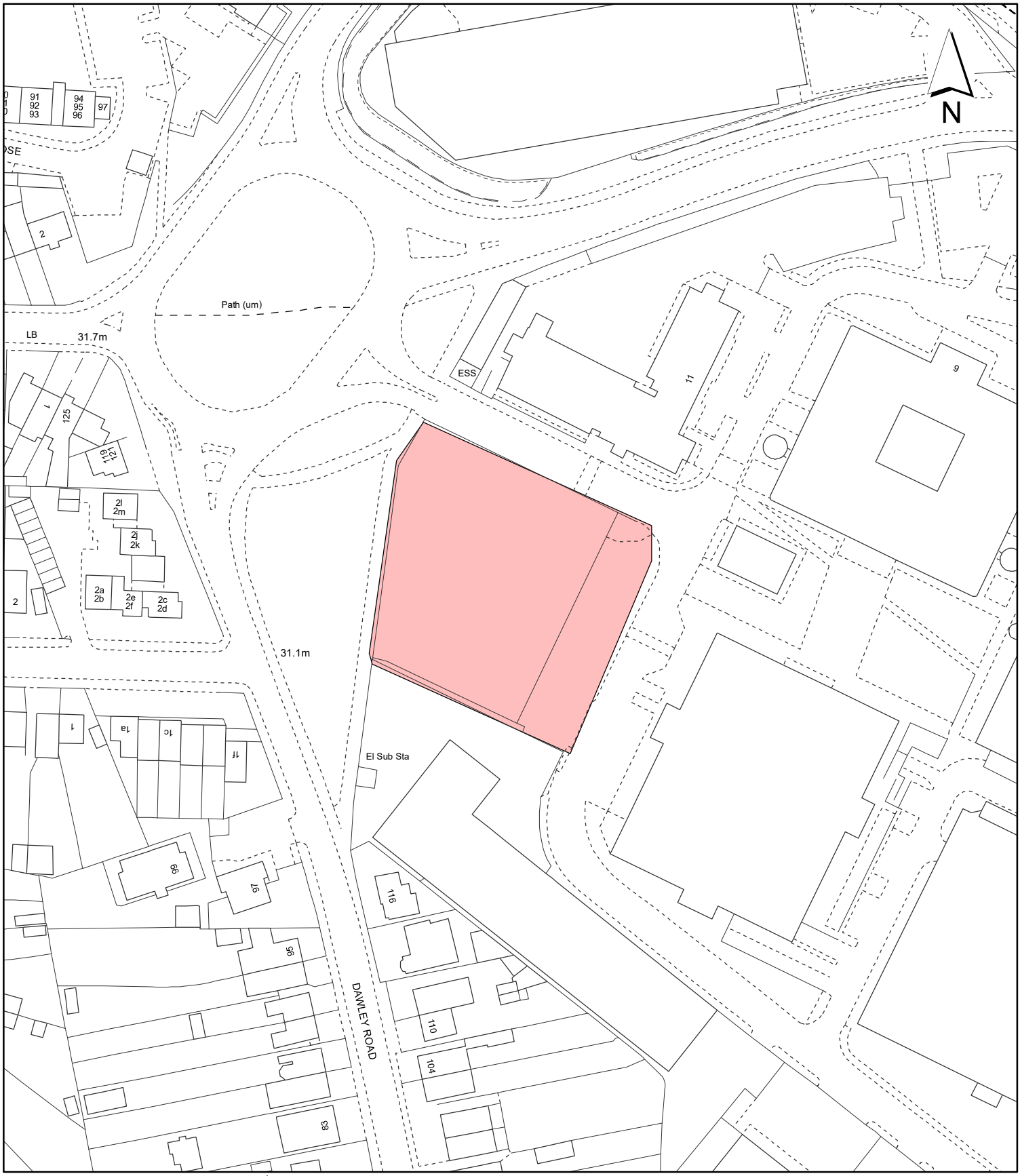

Notes:

Site boundary

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HILLINGDON
LONDON