

## **Report of the Head of Planning, Transportation and Regeneration**

<b>Address</b>	LAND AT YIEWSLEY LIBRARY & FORMER YIEWSLEY POOL FALLING LANE OTTERFIELD ROAD YIEWSLEY
<b>Development:</b>	<p>Formal Description: Demolition of existing Yiewsley Library Building and the erection of a new residential building on the Yiewsley Library site (Falling Lane) and the erection of a new mixed use building on the former Yiewsley Swimming Pool site (Otterfield Road), with a replacement library at ground floor level and residential uses above.</p> <p>Detailed Description: Demolition of existing Yiewsley Library Building and the erection of a 5-storey residential building, comprising 50 dwellings, with 28 undercroft parking spaces (13 for residential and 15 for use by Rabbsfarm Primary School). The Otterfield Road site proposes the erection of a 6-storey building, comprising 50 dwellings, with 25 car parking spaces (23 for residential and 2 for library users).</p>
<b>LBH Ref Nos:</b>	76795/APP/2021/3704
<b>Drawing Nos:</b>	<p>3476-FALL-ICS-01-XX-DR-C-0200 (Rev. P03) Falling Lane Proposer Drainage Plan</p> <p>476-FALL-ICS-XX-RP-C-001 (Rev. B) Falling Lane - Flood Risk Assessment and Drainage Statement</p> <p>3477-OTTE-ICS-01-XX-DR-C-0200 (Rev. P04) Otterfield Road Proposer Drainage Layout</p> <p>3477-OTTE-ICS-XX-RP-C-001 (Rev. B) Otterfield Road - Flood Risk Assessment and Drainage Statement</p> <p>TH 1958 (01-02-21) Otterfield Road Arboricultural Impact Assessment Method Statement and Tree Protection Plan</p> <p>TH 1957 (01-02-21) Falling Lane - Arboricultural Impact Assessment Method Statement and Tree Protection Plan</p> <p>M9534- HUN- DR- APL213 (Rev. C) Otterfield Road - Proposed 3D Visuals</p> <p>M9534- HUN- DR- APL212 (Rev. C) Otterfield Road - Proposed Section</p> <p>M9534- HUN- DR- APL211 (Rev. C) Otterfield Road - Proposed South Elevation</p> <p>M9534- APL210 (Rev. C) Otterfield Road - Proposed North Elevation</p> <p>M9534- APL209 (Rev. C) Otterfield Road - Proposed East Elevation</p> <p>M9534- HUN- DR- APL208 (Rev. C) Otterfield Road - Proposed West Elevation</p> <p>M9534- APL207 (Rev. C) Otterfield Road - Proposed Roof Plan</p> <p>M9534- APL206 (Rev. D) Otterfield Road - Proposed Fourth and Fifth Floor Plan</p> <p>M9534- APL205 (Rev. D) Otterfield Road - Proposed Second and Third Floor Plan</p> <p>M9534- HUN- DR- APL204 (Rev. D) Otterfield Road - Proposed Ground and First Floor Plan</p> <p>M9534-APL201 (Rev. B) Otterfield Road - Topographical Plan</p> <p>M9534-APL118 (Rev. B) Falling Lane - Proposed 3D Visuals</p> <p>M9534-HUN-A-APL116 (Rev. B) Falling Lane - Proposed Section</p> <p>M9534-APL115 (Rev. B) Falling Lane - Proposed North-East Elevation</p> <p>M9534- APL203 (Rev. C) Otterfield Road - Proposed Landscape Plan</p>

M9534- APL202 (Rev. C) Otterfield Road - Proposed Site Plan  
 M9534- HUN- A- APL117 (Rev. C) Falling Lane - Streetscene Elevation  
 M9534- APL112 (Rev. D) Falling Lane - Proposed North-West Elevation  
 M9534- APL110 (Rev. D) Falling Lane - Proposed Fourth Floor Plan  
 M9534- APL109 (Rev. D) Falling Lane - Proposed Third Floor Plan  
 M9534- APL108 (Rev. D) Falling Lane - Proposed Second Floor Plan  
 M9534- APL107 (Rev. D) Falling Lane - Proposed First Floor Plan  
 M9534- APL106 (Rev. D) Falling Lane - Proposed Ground Floor Plan  
 M9534- APL105 (Rev. C) Falling Lane - Proposed Landscape Plan  
 M9534- APL104 (Rev. C) Falling Lane - Proposed Site Plan  
 M9534-APL111\_A\_PROPOSED ROOF PLAN\_1-100\_AC  
 M9534\_Yiewsley Housing and Library Sites Design and Access Statement  
 M9534\_Yiewsley Housing and Library Sites Design and Access Statement  
 M9534\_Residential Units Cover Letter\_Yiewsley Housing  
 F14/146109/GRA (January 2014) Otterfield Road - Phase 2 Generic Human  
 Health Risk Assessment  
 F14/146109/PRA (January 2014) Otterfield Road - Phase 1 Preliminary Risk  
 Assessment  
 F13/1/HA (17-01-13) Otterfield Road - Contamination Hazard Assessment  
 M9534-APL225 (Rev. A) Otterfield Road Fifth Floor Fire Drawing  
 M9534-APL224 (Rev. A) Otterfield Road Fourth Floor Fire Drawing  
 M9534-APL223 (Rev. A) Otterfield Road Third Floor Fire Drawing  
 M9534-APL222 (Rev. A) Otterfield Road Second Floor Fire Drawing  
 M9534-APL221 (Rev. A) Otterfield Road First Floor Fire Drawing  
 M9534-APL220 (Rev. A) Otterfield Road Ground Floor Fire Drawing  
 Design and Access Statement (September 2021)  
 Affordable Housing Cover Letter Oct 21  
 M9534-APL114 (Rev. B) Falling Lane - Proposed South-East Elevation  
 M9534-APL113 (Rev. B) Falling Lane - Proposed South-West Elevation  
 M9534-APL111 (Rev. B) Falling Lane - Proposed Roof Plan  
 Yiewsley and West Drayton Heritage Statement - Falling Lane  
 Yiewsley and West Drayton Heritage Statement - Otterfield Road  
 20204.R4 - GLA Energy Statement - Yiewsley Sites  
 AQ107192-1 - Falling Lane Site\_192 High Street\_Yiewsley - Air Quality  
 Assessment  
 AQ107192-2 - 35 Otterfield Road\_West Drayton - Air Quality Assessment  
 Falling Lane, Yiewsley - Ecological Impact Assessment FINAL 160719  
 Otterfield Road and Falling Lane - Preliminary Ecological Appraisal FINAL  
 011221  
 Yiewsley Housing - 211126 - London Plan Fire Statement Rev.0  
 26770REP-1A (Noise Impact Assessment)  
 20204.R1 - Daylight Analysis - Yiewsley Sites  
 Supporting Access Information prepared by hunters (recd 4/2/22)  
 Design and Access Statement Addendum (February 2022)  
 M9534-APL103 (Rev. B) Falling Lane - Existing Plans and Elevation  
 M9534-APL102 (Rev. B) Falling Lane - Topographical Plan  
 M9534-HUN-A-APL101 (Rev. B) Site Location Plan  
 M9534-APL124 (Rev. A) Falling Lane Fourth Floor Fire Drawing  
 M9534-APL123 (Rev. A) Falling Lane Third Floor Fire Drawing  
 M9534-APL122 (Rev. A) Falling Lane Second Floor Fire Drawing



M9534-APL121 (Rev. A) Falling Lane First Floor Fire Drawing  
 M9534-APL120 (Rev. A) Falling Lane Ground Floor Fire Drawing  
 SJ/RW/ITB14706-002D (04 February 2022) Otterfield Road - Transport  
 Statement  
 SJ/RW/HC/ITB14706-003 (04 February 2022) Otterfield Road - Travel Plan  
 SJ/RW/ITB14707-002D (04 February 2022) Falling Lane - Transport  
 Statement  
 SJ/RW/HC/ITB14707-003A (04 February 2022) Falling Lane - Travel Plan  
 APL214 (Rev. B) Illustrative Park Enhancements Plan  
 M9534-HUN-DR-APL215 (Rev. A) Proposed CGI View  
 M9534-HUN-DR-APL300 (Rev. A) Otterfield Road Daylight Impact Site  
 Sections  
 M9534-HUN-A-APL301 (Rev. A) Falling Lane Daylight Impact Site Section  
 M9534-HUN-A-UGF001 (Rev. A) Falling Lane - Updated UGF Calculation  
 M9534-UGF002 (Rev. A) Otterfield Road - Updated UGF Calculation

**Date Plans Received:** 05/10/2021

**Date(s) of Amendment(s):** 10/02/2022

**Date Application Valid:** 27/10/2021

05/10/2021

## 1. SUMMARY

The proposal comprises two parcels of land sited to the east and west of Yiewsley Recreation Ground, and the application seeks permission to erect a five and six storey building on the western and eastern plots respectively, each comprising of 50 flats, for a combined total of 100 dwellings. To facilitate this proposal, the existing Yiewsley library building would need to be demolished, and a replacement library is proposed within the eastern plot.

The proposal is considered to be acceptable in principle, making effective use of two town centre brownfield sites within the Heathrow Opportunity Area to provide additional housing, and notably provide 50% affordable housing (50 units), secured as London Affordable Rent, with an improvement to the provision of community floorspace for local residents as a result of the larger replacement library. The proposals do not involve any development on Metropolitan Open land (the local plan designation which protects the public park).

The proposed Falling Lane building's overall scale, density, and layout is considered to respond well to its context, stepping up appropriately from the undeveloped parkland and lower-scale housing and High Street buildings. The proposed detailed design is of high quality, with the proposed Falling Lane building providing a coherent frontage at all levels facing onto the public highway whilst optimising the site's layout to include ground-floor parking and a communal garden, with front doors onto Falling Lane and High Street reinforcing the proposed residential character.

The planning assessment identified the proposed Otterfield Road development as a tall building. The proposed building would have a varied height, and it is considered that its overall up-and-down stepped appearance helps reduce its perception of scale, with detailed design features that give the building a human scale. It is accepted that the proposed development site is not in an area suitable for tall buildings, leading to moderate conflict with the 'locations' part of policies D9 and DMHB10.

However, the design of both buildings, including their massing, scale, bulk and detailed architecture, is considered appropriate for the location, seeking to optimise densities in sustainable brownfield locations. The development will also make a positive contribution by providing new homes that meet the borough's identified needs, bringing an underused brownfield site into use, providing a more extensive public library, and supporting improvements to the adjoining park and public realm of the town centre. These benefits are given significant weight. Therefore, on balance, the proposal's benefits far outweigh the limited harm caused by the identified partial policy conflict of the Otterfield Building to tall building policy. Having due regard to the need to optimise the use of the site, the impacts on townscape, residential amenity and local transport impacts are all considered to be acceptable. The development fully complies with policies GG2, SD1, D1, D2 and D3 of the London Plan.

Due to the siting of both buildings and separation distances between facing windows, the residential amenity of nearby properties would be acceptable in terms of access to natural light, outlook or a loss of privacy. The quality of accommodation proposed is considered to be to a high standard with sufficient outlook and access to natural light within the future units and amenity spaces, with all units meeting the minimum space standards of the London Plan.

The level of parking proposed is considered to reflect the town centre location and help achieve the Mayor's strategic target of 80% of all trips to be made using sustainable transport. In addition, financial contributions towards consulting on extending nearby Parking Management Schemes and excluding future occupiers of the new developments from being eligible for parking permits would be secured in the legal agreement.

Overall, the proposal is considered to bring forward a number of significant benefits, namely the high provision of affordable housing explicitly targeted at addressing the tenure in the highest demand within the borough, and several on and off-site improvements, including improvements to the public park, the public realm within Yiewsley Town Centre, health contributions. Material considerations, therefore, indicate that the scheme's benefits are such that planning permission should be granted, subject to the conditions outlined in this report and the obligations outlined in the heads of terms.

## **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. 50% on site Affordable Housing (50 units) to be delivered as London Affordable Rent (LAR) dwellings;**  
**- 18 one-bedroom units**  
**- 24 two-bedroom, units**  
**- 8 three-bedroom units.**

**ii. Library re-provision (no loss of library provision);**

**iii. Air Quality Contribution: A financial contribution amounting to £18,526 shall be paid to address the air quality impacts of the proposed development;**

**iv. Carbon Offset Contribution:** A financial contribution amounting to £27,360 for the Otterfield Road development and £22,230 for the Falling Lane development shall be paid to the Council's carbon offset fund;

**v. Public Open Space:** Submission of a detailed Plan for the upgrade of the park to include, but not limited to, new playground, improved pedestrian access and boundary treatment on the Otterfield Road site and footpath, tree planting, footpath upgrade and ramp upgrade;

**vi. Highways Works and S278 works;**

**vii. Local Highways Improvements/ATZ works:** A financial contribution amounting to £125,476 to deliver:

Works to improve the Y29 footpath £38,276  
Pedestrian access to the Park from Otterfield Road £35,000  
Bus Shelter works (High Street) £22,500  
Tactile Paving/Dropped Kerbs/Localised Parking restrictions £5,500  
Santander Bike Scheme; £17,500  
New Seating/Bench installation £6,000  
New Bin installations £700  
**TOTAL: £125,476;**

**viii. Parking Management Scheme Review:** A financial contribution amounting to £40,000 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;

**ix. 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;

**x. 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 (including future Parking Management Schemes which are introduced), apart from Blue Badge holders and a charge made against the site to ensure the future buyers are aware of the parking restrictions;

**xi. 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;

**xii. HUDU Health Contribution:** A financial contribution amounting to £65,689 shall be paid to the Council for the enhancement of health infrastructure provision;

**xiii. Falling Lane site; Retention in perpetuity of 15 car parking spaces for Raabs**

**Farm school pick up and drop off;**

**xiv. 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 COM3 Time Limit**

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

**REASON**

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

**2 COM4 Accordance with Approved Plans**

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

APL101 rev B  
APL102 rev B  
APL103 rev B  
APL104 rev C  
APL105 rev C  
APL106 rev D  
APL107 rev D  
APL108 rev D  
APL109 rev D  
APL110 rev D

APL111 rev C  
APL112 rev D  
APL113 rev B  
APL114 rev B  
APL115 rev B  
APL116 rev C  
APL117 rev C

APL201 rev B  
APL202 rev C  
APL203 rev C  
APL204 rev D  
APL205 rev D  
APL206 rev D  
APL207 rev C  
APL208 rev C  
APL209 rev C  
APL210 rev C  
APL211 rev C  
APL212 rev C  
APL213 rev C

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 Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

#### **3 COM5 General compliance with supporting documentation**

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

#### BOTH SITES:

M9534\_Yiewsley Housing and Library Sites Design & Access Statement Addendum  
M9534\_Access Responses\_Yiewsley Housing and Library Sites  
20204.R4 - GLA Energy Statement - Yiewsley Sites  
Yiewsley Housing - 211126 - London Plan Fire Statement Rev.01 (and associated drawing APL225 rev A, APL224, APL223 rev A, APL222 rev A, APL221 rev A, APL220 rev A, APL124 rev A, APL123 rev A, APL122 rev A, APL121 rev A, APL120 rev A)  
26770REP-1A (Noise Impact Assessment)  
20204.R1 - Daylight Analysis - Yiewsley Sites  
M9534-APL214\_B\_PROPOSED ILLUSTRATIVE UPGRADE TO PARK\_1-250\_A0  
M9534\_Residential Units Cover Letter\_Yiewsley  
Affordable Housing Cover Letter Oct 21

#### FALLING LANE ONLY:

M9534-APL301\_A\_Falling Lane\_Daylight Impact Site Section\_1-200\_A0  
M9534-UGF001\_A\_Falling Lane\_Urban Greening Factor Calculation\_1-100\_A0  
Arboricultural Report for Yiewsley Library and Car Park  
3476-FALL-ICS-01-XX-DR-C-0200-S2-P03 - Proposed Drainage Plan

3476-FALL-ICS-RP-C-07.001B - Flood Risk Assessment and Drainage Strategy  
ITB14707-002D R Transport Statement Falling Lane  
ITB14707-003B Travel Plan Statement  
Yiewsley and West Drayton Heritage Statement - Falling Lane  
AQ107192-1 - Falling Lane Site\_192 High Street\_Yiewsley - Air Quality Assessment  
Falling Lane, Yiewsley - Ecological Impact Assessment FINAL 160719

**OTTERFIELD ROAD ONLY:**

M9534-APL300\_A\_DAYLIGHT IMPACT SITE SECTION\_1-200\_A0  
M9534-UGF002\_A\_Otterfield Road\_Urban Greening Factor Calculation\_1-200\_A0  
Arboricultural Report for Former Yiewsley Swimming Pool Otterfield Road  
3477-OTTE-ICS-01-XX-DR-C-0200-S2-P04 - Proposed Drainage Layout  
3477-OTTE-ICS-RP-C-07.001B - Flood Risk Assessment and Drainage Strategy  
ITB14706-002D R Transport Statement Otterfield Road  
ITB14706-003B Travel Plan Statement  
Yiewsley and West Drayton Heritage Statement - Otterfield Road  
AQ107192-2 - 35 Otterfield Road\_West Drayton - Air Quality Assessment  
Otterfield Road and Falling Lane - Preliminary Ecological Appraisal FINAL 011221  
F14/146109/GRA (January 2014) Otterfield Road - Phase 2 Generic Human Health Risk Assessment  
F14/146109/PRA (January 2014) Otterfield Road - Phase 1 Preliminary Risk Assessment  
F13/1/HA (17-01-13) Otterfield Road - Contamination Hazard Assessment

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

**REASON**

To ensure that the development complies with the objectives of Policies . Specify Hillingdon Local Plan Part 2 (2020)

**4 COM10 Tree to be retained; Falling Lane**

**FALLING LANE**

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

Remedial work should be carried out to BS BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first

planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

#### REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

### **5 COM10 Tree to be retained; Otterfield Road**

#### OTTERFIELD ROAD

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

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

#### REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

### **6 COM15 Sustainable Water Management; Falling Lane**

#### FALLING LANE

Prior to works above ground floor level (excluding demolition), the following details shall be submitted to, and approved in writing by, the local planning authority:

- a) Cross sectional details of the green road, including details of how it will operate and the initial flush of water that this will control.
- b) Further details of the long-term management and maintenance of the drainage system is also needed to include:
  - i. 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. Details of the necessary inspection regimes and maintenance frequencies.

c) Measures to minimise water use, including:

i. Water saving measures and equipment.

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

Thereafter the development shall be implemented and retained 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).

### **7 COM15 Sustainable Water Management; Otterfield Road**

#### **FALLING LANE**

Prior to works above ground floor level (excluding demolition), the following details shall be submitted to, and approved in writing by, the local planning authority:

a) Cross sectional details of the green road, including details of how it will operate and the initial flush of water that this will control.

b) Further details of the long-term management and maintenance of the drainage system is also needed to include:

i. 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. Details of the necessary inspection regimes and maintenance frequencies.

c) Measures to minimise water use, including:

i. Water saving measures and equipment.

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

Thereafter the development shall be implemented and retained 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).



## **8 COM26 Ecology; Otterfield Road**

### **OTTERFIELD ROAD**

Prior to the commencement of the proposed Otterfield Road building (including site clearance) a badger survey shall be conducted to determine the presence or absence of badgers. The findings of the report and the methodology used to ascertain the presence of badgers shall be submitted to and approved in writing by the Local Planning Authority.

The report shall also set out recommendations and method statements necessary to protect badgers and badger setts, if any are found to be present.

The development of the Otterfield Road site shall be carried out in accordance with the approved recommendations and method statements.

In addition no development shall take place until a scheme to protect and enhance the nature conservation interest of the site has been submitted to and approved in writing by the Local Planning Authority.

As a minimum the building should include two Vivara Pro WoodStone house sparrow terrace boxes (or house sparrow boxes of a similar design) to encourage colonisation of the site by this species of conservation concern and one WoodStone Swift Nest Box to provide nesting opportunities for this declining species, known to be present in the area. Thereafter the development shall be implemented and retained in accordance with these details for as long as the development remains in existence.

#### **REASON**

In order to encourage a wide diversity of wildlife on the site in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020), Policies G5 and G6 of the London Plan (2021) and Paragraph 174 of the National Planning Policy Framework (2021).

## **9 COM26 Ecology; Falling Lane**

### **FALLING LANE**

No development shall take place until a scheme to protect and enhance the nature conservation interest of the site has been submitted to and approved by the Local Planning Authority. As a minimum the building should include two Vivara Pro WoodStone house sparrow terrace boxes (or house sparrow boxes of a similar design) to encourage colonisation of the site by this species of conservation concern and one WoodStone Swift Nest Box to provide nesting opportunities for this declining species, known to be present in the area.

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

#### **REASON**

In order to encourage a wide diversity of wildlife on the site in accordance with policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020), London Plan (2021) Policies G5 and G6 and Paragraph 174 of the National Planning Policy Framework (2021).

## **10 COM27 Fire Statement; Falling Lane**

### **FALLING LANE**

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 hereby approved, 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).

#### **11 COM27 Fire Statement; Otterfield Rd** **OTTERFIELD ROAD**

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 hereby approved, 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).

### **12 COM30 Contaminated Land; Falling Lane**

#### **FALLING LANE**

(i) The development shall not commence until a further and, as appropriate, updated scheme to deal with contamination has been submitted to and approved in writing 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 desk-top study, for the Falling Lane site, is to be conducted by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;

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

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

(d). An updated summary of the previously conducted site investigation, including the recorded 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

(e) A written method statement providing details of the remediation scheme/s, including details of how 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/s is identified an addendum to the remediation scheme/s 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/s are submitted to and approved by the LPA. The report/s shall include the details of the final remediation works and their verification to show that the works at each site 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/s. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development/s 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.

### **13 COM30 Contaminated Land; Otterfield Road**

#### **OTTERFIELD ROAD**

(i) The development shall not commence until a further and, as appropriate, updated scheme to deal with contamination have 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 desk-top study at the Otterfield Road site is to be conducted by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;

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

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

(d). An updated summary of the previously conducted site investigation, including the

recorded 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

(e) A written method statement providing details of the remediation scheme/s, including details of how 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/s is identified an addendum to the remediation scheme/s 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/s are submitted to and approved by the LPA. The report/s shall include the details of the final remediation works and their verification to show that the works at each site 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/s. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development/s 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.

#### **14 COM31 Secured by Design; Falling Lane** **FALLING LANE**

The entire site (building and carp parks) shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

#### REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2021) Policies D11 and D12.

#### **15 COM31 Secured by Design; Otterfield Road**

## OTTERFIELD ROAD

The entire site (building and carp parks) shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

### REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2021) Policies D11 and D12.

## **16            B21            Noise Insulation of Residential Development; Falling Lane** **FALLING LANE**

The development hereby approved shall not be occupied until details of a Sound Insulation Scheme, and any other control measures required to achieve ambient sound levels which are no higher than the relevant internal targets within the current version of the ProPG: Planning & Noise, are submitted to, and approved in writing by, the Local Planning Authority.

The Sound Insulation Scheme shall account for both ventilation and overheating conditions, and to minimise noise levels within external amenity areas as far as practicable. The measures shall be determined based on a detailed sound level survey, including at least one fixed location for a period of no less than 72-hours, and detailed calculations or modelling of the equivalent levels within and around the development. The measures shall take into account the ventilation and overheating control strategy/strategies, with any sound generated within the development by associated plant controlled to not exceed relevant targets, such as those within the current version of the Acoustics, Ventilation and Overheating Residential Design Guide.

### REASON

To safeguard the amenity of the occupants of the development in accordance with Policy D14 of the London Plan (2021) and Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (2012).

## **17            B21            Noise Insulation of Residential Development; Otterfield Road** **OTTERFIELD ROAD**

The development hereby approved shall not be occupied until details of a Sound Insulation Scheme, and any other control measures required to achieve ambient sound levels which are no higher than the relevant internal targets within the current version of the ProPG: Planning & Noise, are submitted to, and approved in writing by, the Local Planning Authority.

The Sound Insulation Scheme shall account for both ventilation and overheating conditions, and to minimise noise levels within external amenity areas as far as practicable. The measures shall be determined based on a detailed sound level survey, including at least one fixed location for a period of no less than 72-hours, and detailed calculations or modelling of the equivalent levels within and around the development. The

measures shall take into account the ventilation and overheating control strategy/strategies, with any sound generated within the development by associated plant controlled to not exceed relevant targets, such as those within the current version of the Acoustics, Ventilation and Overheating Residential Design Guide.

**REASON**

To safeguard the amenity of the occupants of the development in accordance with Policy D14 of the London Plan (2021) and Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (2012).

**18            B22            Noise Emissions; Falling Lane**

**FALLING LANE**

The development hereby approved shall not be occupied until details are provided to, and approved by in writing by, the Local Planning Authority, for any building services plant equipment that would result in sound emitted externally, together with details of any measures required for noise control to safeguard the amenity of the occupants of both the proposed scheme and the existing neighbouring dwellings. The plant equipment shall be selected and installed so as to minimise sound externally to a practicable minimum, and, where required (due to risk of noise impact), the plant and background sound levels should be determined and assessed in accordance with the Council's Noise SPD (2006) and the current version of BS 4142.

**REASON**

To safeguard the amenity of the occupants of the development and surrounding properties in accordance with Policy D14 of the London Plan and Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012).

**19            B22            Noise Emissions; Otterfield Road**

**OTTERFIELD ROAD**

The development hereby approved shall not be occupied until details are provided to, and approved by in writing by, the Local Planning Authority, for any building services plant equipment that would result in sound emitted externally, together with details of any measures required for noise control to safeguard the amenity of the occupants of both the proposed scheme and the existing neighbouring dwellings. The plant equipment shall be selected and installed so as to minimise sound externally to a practicable minimum, and, where required (due to risk of noise impact), the plant and background sound levels should be determined and assessed in accordance with the Council's Noise SPD (2006) and the current version of BS 4142.

**REASON**

To safeguard the amenity of the occupants of the development and surrounding properties in accordance with Policy D14 of the London Plan and Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012).

**20            NONSC            Energy; Falling Lane**

**FALLING LANE**

Prior to above ground works, a detailed energy scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out the detailed energy performance of the buildings in line with the London Plan requirements. The scheme shall demonstrate the baseline emissions (i.e. the development assessed to the

requirements of Part L Building Regulations) and then how the following savings over the approved baseline will be achieved:

Falling Lane - 84% saving over baseline

This is in accordance with the submitted energy strategy by QODA, September 2021.

The development must proceed in accordance with the approved plans unless otherwise agreed in writing with the Local Planning Authority.

#### REASON

To ensure the development delivers the CO2 savings as set out in the energy strategy and in accordance with the London Plan Policy SI 2 (2021).

### **21 COM6 Energy; Otterfield Road**

#### **OTTERFIELD ROAD**

Prior to above ground works, a detailed energy scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out the detailed energy performance of the buildings in line with the London Plan requirements. The scheme shall demonstrate the baseline emissions (i.e. the development assessed to the requirements of Part L Building Regulations) and then how the following savings over the approved baseline will be achieved:

Otterfield Road - 82% saving over baseline

This is in accordance with the submitted energy strategy by QODA, September 2021.

The development must proceed in accordance with the approved plans unless otherwise agreed in writing with the Local Planning Authority.

#### REASON

To ensure the development delivers the CO2 savings as set out in the energy strategy and in accordance with the London Plan Policy SI 2 (2021).

### **22 COM7 Materials (Submission); Falling Lane**

#### **FALLING LANE**

Prior to commencement of works above ground floor level details of all materials and external surfaces, including details of balconies have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include information relating to make, product/type, colour and photographs/images.

#### REASON

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

### **23 COM7 Materials (Submission); Otterfield Road**

#### **OTTERFIELD ROAD**



Prior to commencement of works above ground floor level details of all materials and external surfaces, including details of balconies have been submitted to and approved in writing by the Local Planning Authority. Details submitted should also include details of external library signage. Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

Details should include information relating to make, product/type, colour and photographs/images.

#### REASON

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

### **24 COM8 Tree Protection; Falling Lane**

#### **FALLING LANE**

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)

### **25 COM8 Tree Protection; Otterfield Road**

## OTTERFIELD ROAD

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)

## **26 COM9 Landscaping; Falling Lane**

### **FALLING LANE**

Prior to commencement of works above ground floor level, a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

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

- 2.b Cycle Storage
- 2.c Means of enclosure/boundary treatments
- 2.d Car Parking Layouts (including demonstration that 20% of all parking spaces are served by electrical charging points)
- 2.e Hard Surfacing Materials
- 2.f External Lighting
- 2.g Other structures (such as play equipment and furniture)

### 3. Living Walls and Roofs

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

### 4. Details of Landscape Maintenance

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

### 5. Schedule for Implementation

### 6. 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.

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).

## **27 COM9 Landscaping; Otterfield Road**

### **OTTERFIELD ROAD**

Prior to commencement of works above ground floor level, a landscape scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

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

2. Details of Hard Landscaping
  - 2.a Refuse Storage
  - 2.b Cycle Storage
  - 2.c Means of enclosure/boundary treatments
  - 2.d Car Parking Layouts (including demonstration that 20% of all parking spaces are served by electrical charging points)
  - 2.e Hard Surfacing Materials
  - 2.f External Lighting
  - 2.g Other structures (such as play equipment and furniture)
3. Living Walls and Roofs
  - 3.a Details of the inclusion of living walls and roofs
  - 3.b Justification as to why no part of the development can include living walls and roofs
4. Details of Landscape Maintenance
  - 4.a Landscape Maintenance Schedule for a minimum period of 5 years.
  - 4.b Proposals for the replacement of any tree, shrub, or area of surfacing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.
5. Schedule for Implementation
6. 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.

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).

#### **28 NONSC Overheating;Falling Lane**

##### **FALLING LANE**

Prior to commencement of works above ground floor level, 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 of the London Plan (2021).

### **29 NONSC Overheating; Otterfield Road**

#### OTTERFIELD ROAD

Prior to commencement of works above ground floor level, 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 of the London Plan (2021).

### **30 RES11 Play Area provision of details; Falling Lane**

Prior to commencement of works above ground floor level, full details of on-site children's play areas shall be submitted to, and approved in writing by, the Local Planning Authority. The proposed play area must be a minimum of 125sqm. The details of the children's play area and play equipment to be installed shall achieve substantial compliance with the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation' (September 2012) (or such other relevant standard) and shall clearly set out the type and location of accessible play equipment for disabled children, to include sound tubes, colour and lighting canopies, and/or other play equipment that can stimulate the olfactory senses.

Thereafter, the play areas shall be provided prior to the occupation of any unit within the development and maintained for this purpose only.

#### REASON

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

#### **31 RES11 Play Area provision of details; Otterfield Road**

Prior to commencement of works above ground floor level, full details of on-site children's play areas shall be submitted to, and approved in writing by, the Local Planning Authority. the proposed play area must be a minimum of 125sqm. The details of the children's play area and play equipment to be installed shall achieve substantial compliance with the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation' (September 2012) (or such other relevant standard), and shall clearly set out the type and location of accessible play equipment for disabled children, to include sound tubes, colour and lighting canopies, and/or other play equipment that can stimulate the olfactory senses.

Thereafter, the play areas shall be provided prior to the occupation of any unit within the development and maintained for this purpose only.

#### REASON

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

#### **32 RES22 Parking Allocation; Falling Lane**

##### FALLING LANE

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 RESIDENTIAL 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.
- (iii) The final arrangements for managing the Rabbsfarm School Car Parking Area, including the access gate arrangements to ensure the future security of this parking area.

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).

#### **33 RES22 Parking Allocation; Otterfield Road**

##### OTTERFIELD ROAD

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.
- (iii) The arrangements and allocation of the library car parking spaces provided on site.

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).

### **34            H14            Cycle Storage - details to be submitted - Falling Lane**

#### **FALLING LANE**

Notwithstanding the submitted details, prior to the commencement of above ground works at the Falling Lane site, excluding demolition and site clearance works, details of the proposed cycle storage facilities within and outside that building, shall be submitted to and approved in writing by the Local Planning Authority.

The cycle parking details shall demonstrate that:

- at least the minimum quantum of short-stay and long-stay, as identified in Policy T5 of the London Plan (2021) is provided;
- no less than 5% of all provision within each cycle store is available on Sheffield stands with wide spacing (1.8m spacing, or 900mm side space if wider cycles are expected just on one side of a stand) for larger/wider cycles;
- no less than 20% of all residential cycle parking spaces are provided on Sheffield stands at a minimum of 1.0m spacing;
- all other matters are in accordance with the London Cycling Design Standards; and
- cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

The cycle parking provision shall be fully implemented as approved, prior to the first occupation of the relevant phase, and so maintained in good working order and shall not used for any other purpose.

#### REASON

To ensure that adequate arrangements are made for cycle parking in accordance with Policy T5 of the London Plan (2021).

### **35            H16            Cycle Storage - details to be submitted - Otterfield Road**

#### **OTTERFIELD ROAD**

Notwithstanding the submitted details, prior to the commencement of above ground works

at the Otterfield Road site, excluding demolition and site clearance works, details of the proposed cycle storage facilities within and outside that building, shall be submitted to and approved in writing by the Local Planning Authority.

The cycle parking details shall demonstrate that:

- at least the minimum quantum of short-stay and long-stay, as identified in Policy T5 of the London Plan (2021) is provided;
- no less than 5% of all provision within each cycle store is available on Sheffield stands with wide spacing (1.8m spacing, or 900mm side space if wider cycles are expected just on one side of a stand) for larger/wider cycles;
- no less than 20% of all residential cycle parking spaces and 10% of commercial cycle parking spaces are provided on Sheffield stands at a minimum of 1.0m spacing;
- all other matters are in accordance with the London Cycling Design Standards; and
- cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

The cycle parking provision shall be fully implemented as approved, prior to the first occupation of the relevant phase, and so maintained in good working order and shall not be used for any other purpose.

#### REASON

To ensure that adequate arrangements are made for cycle parking in accordance with Policy T5 of the London Plan (2021).

### **36            DIS1            External Accessibility; Falling Lane**

#### **FALLING LANE**

Prior to the commencement of works above ground floor level, full details of access arrangements for people with mobility difficulties, for all external parts of the development shall be submitted to, and approved in writing by, the Local Planning Authority.

For the avoidance of doubt this shall include large scale plans illustrating the different gradients on all routes to and through the site for that phase, including details of ramps, steps, gates, canopies above main entrances (shelter), street furniture (potential obstructions), and details of access to disabled parking where applicable (parking spaces must have a minimum clear headroom of 220 mm and a crossfall of not more than 1:60).

The development shall be completed in accordance with the approved details.

#### REASON

To facilitate the movement of those with mobility difficulties and to comply with Policies D5 and D8 of the London Plan (2021).

### **37            DIS2            External Accessibility; Otterfield Road**

#### **OTTERFIELD ROAD**

Prior to the commencement of works above ground floor level, full details of access arrangements for people with mobility difficulties, for all external parts of the development shall be submitted to, and approved in writing by, the Local Planning Authority.

For the avoidance of doubt this shall include large scale plans illustrating the different gradients on all routes to and through the site for that phase, including details of ramps,



steps, gates, canopies above main entrances (shelter), street furniture (potential obstructions), and details of access to disabled parking where applicable (parking spaces must have a minimum clear headroom of 220 mm and a crossfall of not more than 1:60).

The development shall be completed in accordance with the approved details.

#### REASON

To facilitate the movement of those with mobility difficulties and to comply with Policies D5 and D8 of the London Plan (2021).

### **38 NONSC Signs, Road Marking and Traffic Calming**

Prior to the commencement of the development hereby approved, excluding demolition and site preparation works, full details (including detailed plans) of traffic calming measures, road markings, signs (including those for wayfinding), street furniture, flags, poles, bus shelters, street lighting, highways drainage, location of highways and footways, and plants and trees (including size and species), together with maintenance and management arrangements, shall be submitted to, and approved in writing by, the Local Planning Authority.

The details shall include, where relevant, carriage and footway widths, tracked vehicle movements (including HGVs and buses) and ways to minimise conflict between pedestrians, cyclists and vehicles through passive design. This should include private highway, footway and cycles ways and make reference to consideration of bus operations and passengers (where relevant), including any new or temporary footways or cycleways introduced.

The development shall be implemented in accordance with the approved details and so retained.

#### REASON

In order to maintain safety for all road users and to ensure compliance with Policy T3 of the London Plan (2021).

### **39 NONSC Openable Windows and Doors;Falling Lane**

#### **FALLING LANE**

No new ground floor window or door shall open out onto or over the public highway (including the pavement), except those required for emergency access.

Reason: In the interest of pedestrian safety and ease of movement for pedestrians on Falling Lane and Yiewsley High Street.

### **40 RES25 No floodlighting**

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

#### REASON

To safeguard the amenity of surrounding properties in accordance with policies DMHB 11 of the Hillingdon Local Plan Part 2 (2020); and

To protect the ecological value of the area in accordance with Policy DMEI 7.

**41 NONSC Section M(4)2 and M (4) 3 Accessible Units; Falling Lane**  
**FALLING LANE**

(A) 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.

(B) Of the remaining 10%, 3 x two-bed units shall be constructed to meet the standards for a Category 3, M4(3)(2)(a) Wheelchair Adaptable Standard dwelling and 2 x three-bed units shall be constructed to meet the standards for a Category 3, M4(3)(2)(b) Wheelchair Adaptable Standard 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.

(C) The development hereby approved shall include a minimum of one fire evacuation lift per building designed to meet the technical standards set out in BS EN 81-76, BS 9991 and/or BS 9999, as shown on drawing number M9534-APL107 and M9534-HUN-DR-APL204. The evacuation lift shall serve all floors and remain in place for the life of the development.

(D) All Wheelchair Accessible Standard M4(3)(2)(b) and Wheelchair Adaptable Standard M4(3)(2)(a) units shall each be allocated an accessible parking space, capable of accommodating a high sided vehicle, designed to accord with the specifications set out in BS 8300:2018 which shall remain in place in perpetuity.

**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).

**42 NONSC Section M(4)2 and M (4) 3 Accessible Units; Otterfield Rd**  
**OTTERFIELD ROAD**

(A) 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.

(B) Of the remaining 10%, 3 x two-bed units shall be constructed to meet the standards for a Category 3, M4(3)(2)(a) Wheelchair Adaptable Standard dwelling and 2 x three-bed units shall be constructed to meet the standards for a Category 3, M4(3)(2)(b) Wheelchair Adaptable Standard 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.

(C) The development hereby approved shall include a minimum of one fire evacuation lift per building designed to meet the technical standards set out in BS EN 81-76, BS 9991 and/or BS 9999, as shown on drawing number M9534-APL107 and M9534-HUN-DR-APL204. The evacuation lift shall serve all floors and remain in place for the life of the development.

(D) All Wheelchair Accessible Standard M4(3)(2)(b) and Wheelchair Adaptable Standard M4(3)(2)(a) units shall each be allocated an accessible parking space, capable of accommodating a high sided vehicle, designed to accord with the specifications set out in BS 8300:2018 which shall remain in place in perpetuity.

#### 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).

#### **43 COM25 Loading/unloading/deliveries; Falling Lane**

##### FALLING LANE

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).

#### **44 COM25 Loading/unloading/deliveries; Otterfield Rd**

##### OTTERFIELD ROAD

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).

#### **45 OM19 Construction Management Plan; Falling Lane**

##### FALLING LANE

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).

#### **46            OM19            Construction Management Plan; Otterfield Road**

##### **OTTERFIELD ROAD**

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).

#### **47 NONSC Low Emission Strategy; Falling Lane**

##### FALLING LANE

Prior to commencement of works above ground floor level, 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 Planning Guidance requirements

2) the implementation of electric vehicle charging bay. This is to be implemented in line with the minimum number of charging points required in the London Plan.

3) a clear and effective strategy to encourage staff / 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.

#### 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(e), 186 and 188 of the National Planning Policy Framework (2021).

#### **48 NONSC Low Emission Strategy; Otterfield Road**

##### OTTERFIELD ROAD

Prior to commencement of works above ground floor level, 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 Planning Guidance requirements

2) the implementation of electric vehicle charging bay. This is to be implemented in line with the minimum number of charging points required in the London Plan.

3) a clear and effective strategy to encourage staff / 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.

#### 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(e), 186 and 188 of the National Planning Policy Framework (2021).

#### **49 NONSC NRMM; Falling Lane**

##### FALLING LANE

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

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).

#### **50 NONSC NRMM; Otterfield Road**

##### OTTERFIELD ROAD

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

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 DME1 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).

#### **51            A37            Refuse Collection Area (Residential)**

##### **FALLING LANE**

Details of on-site refuse and recycling storage, including the on-site management plan for bin rotation and collection shall be submitted to and approved by the Local Planning Authority, this shall include plans and documentation. Such facilities shall be provided prior to occupation of the development and thereafter permanently retained.

#### REASON

To ensure adequate collection arrangements are in place in accordance with policy DMHB11 of the :Local Plan Part 2 (2020).

#### **52            A37            Refuse Collection Area (Residential)**

##### **OTTERFIELD ROAD**

Dustbins and enclosed refuse collection areas, details of which shall be submitted to and approved by the Local Planning Authority, shall be sited a maximum distance of 23 metres (10 metres where paladins are employed) from an adopted highway, and 25 metres from any dwelling unit.

#### REASON

To comply with the Council's Design Guide 'Roads in Residential Layouts' and for the convenience of residents.

#### **53            B14A            Balcony Screening; Falling Lane**

##### **FALLING LANE**

Prior to the first occupation of the development hereby approved, a scheme of privacy screening for balconies and communal terraces shall be submitted to, and approved in writing by, the Local Planning Authority.

The scheme shall include details of the type, size and materiality of the proposed privacy screens, together with details of setbacks and/or defensible spaces for all communal amenity areas above ground floor level, to mitigate against loss of privacy and in the interests of safety.

As a minimum, privacy screens shall be installed on the balconies of Units 03, 12, 14, 20, 25, 27, 38, 40, and 41.

The privacy screens shall be installed prior to the first occupation of the development and thereafter retained in perpetuity.

#### REASON

To prevent overlooking between amenity spaces and habitable rooms within the development in accordance with Policy BE1 of the Hillingdon Local Plan Part 2: Development Management Policies (2020).

**54            B7            Balcony Screening; Otterfield Road**

**OTTERFIELD ROAD**

Prior to the first occupation of the development hereby approved, a scheme of privacy screening for balconies and communal terraces shall be submitted to, and approved in writing by, the Local Planning Authority.

The scheme shall include details of the type, size and materiality of the proposed privacy screens, together with details of setbacks and/or defensible spaces for all communal amenity areas above ground floor level, to mitigate against loss of privacy and in the interests of safety.

As a minimum, privacy screens shall be installed on the balconies of Units 08, 15, 18, 21, 22, 27, 28, 30, 33, 34, 38, 40, 42, 46, 47, and 48, and shall include privacy screens for the communal terraces at third, fourth and fifth floor level.

The privacy screens shall be installed prior to the first occupation of the development and thereafter retained in perpetuity.

**REASON**

To prevent overlooking between amenity spaces and habitable rooms within and outside of the development in accordance with Policy BE1 of the Hillingdon Local Plan Part 2: Development Management Policies (2020).

**55            RPD4            Prevention of Balconies/Roof Gardens; Falling Lane**

**FALLING LANE**

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

**REASON**

To prevent overlooking to adjoining properties in accordance with Policy BE1 of the Hillingdon Local Plan: Development Management Policies (2020).

**56            HH-RPD4            Prevention of Balconies / Roof Gardens; Otterfield Road**

**OTTERFIELD ROAD**

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

**REASON**

To prevent overlooking to adjoining properties in accordance with Policy BE1 of the Hillingdon Local Plan: Development Management Policies (2020).

**INFORMATIVES**

**1            I62            Potential Bird Hazards from Buildings; Falling Lane**



## FALLING LANE

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)

## **2            I62            Potential Bird Hazards from Buildings; Otterfield Road**

### **OTTERFIELD ROAD**

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)

## **3            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).

#### **4 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 2021 and national guidance.

DMAV 1	Safe Operation of Airports
DMAV 2	Heathrow Airport
DMAV 3	RAF Northolt
DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 2	New Community Infrastructure
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 6	Development in Green Edge Locations
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 4	Residential Conversions and Redevelopment
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 3	Locally Listed Buildings
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
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 D2	(2021) Infrastructure requirements for sustainable densities
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 G3	(2021) Metropolitan Open Land
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 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 HC1	(2021) Heritage conservation and growth
LPP S1	(2021) Developing London's social infrastructure
LPP SD1	(2021) Opportunity Areas
LPP SD6	(2021) Town centres and high streets
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 T2	(2021) Healthy Streets
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
LPP T7	(2021) Deliveries, servicing and construction

## 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](mailto: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](http://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.

## **6 170 LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

### **3. CONSIDERATIONS**

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

The application site consists of two parcels of land sited to the east and west of Yiewsley Recreational Ground. For ease in this report, the eastern site shall hereafter be referred to as the 'Otterfield Road site' and the western site shall be referred to as the 'Falling Lane site'.

The Otterfield Road site, to the east of the park, is a 4228 sqm triangular-shaped open plot, which has its boundaries formed by the rear garden fences of Nos. 37-71 (odds) Otterfield Road to the east, a public footpath to the west and an access road for the Fairfield Road Car Park to the south. The Otterfield Road site currently has no public access, with boundary hoarding which has been in place for a considerable length of time following the demolition of the swimming pool which was previously located on the site, and was demolished in 2011. The site has been left unattended for some time, and as a result is now characterised by low-level shrubbery, grasses and small trees, although there is still clear evidence of built form on the site with hardstanding occupying much of the site.

The Falling Lane site, to the west of the park, is a rectangular plot with an area of 2421 sqm, comprising a two-storey building facing towards the High Street, with a large area of hardstanding behind laid out as a car park. The building is in use as a library at ground floor level and a fitness centre at first floor level. The site also contains a substation and used to include a single-storey structure for storage, however this was demolished in 2019. The site includes a 42-space public car park, with 16 'park & stride' spaces for the Rabbsfarm School.

The two sites are approximately 110 metres apart, separated by the public park, which includes the bowling green, skatepark, hardcourt games area and an area for children's play equipment. This park, which is classified as Metropolitan Open Land (MOL), contributes towards the spacious and verdant appearance of Falling Lane and provides a pleasing counterpoint to the relatively finer urban grain of the busy High Street and

surrounding residential streets, including Otterfield Road and Fairfield Road, as well as the higher-density developments along Trout Road and St Stephen's Road.

There are a wide mix of uses in the area, however in general, low-scale residential uses are the most dominant type of built form to the north and east of both sites, whereas commercial or business uses tend to characterise the areas to the south of the sites, especially along the High Street and Fairfield Road, with large retail shed-style buildings further afield to the west within Cowley Retail Park. The residential areas to the north and east vary in their styles, appearances and age, but generally comprise a mix of two-storey detached, semi-detached and terraced houses with occasional examples of 3-storey houses or small blocks of flats. The High Street, which forms the heart of the Yiewsley and West Dayton District Centre, is relatively typical for a London town centre, containing a mix of general convenience, retail and restaurant uses as well as other town centre uses, with shops on both sides of the road stretching from Station Road in the south to the junction of the High Street with Falling Lane and Trout Road. It is of relevance that the boundary of the district centre includes both parcels of land within the application site.

Near to the application site, on the High Street, are several locally listed buildings, including the George and Dragon Pub adjacent to the Falling Lane site, with the Former Methodist Chapel and former Town Hall (now Key House) slightly further south. There are no nationally listed buildings which would be affected by the proposals.

### **3.2 Proposed Scheme**

As set out above, the application site comprises two parcels of land; the Falling Lane site (currently occupied by a library and car park) and the Otterfield Road site (which is cleared as a result of the demolition of the swimming pool which used to occupy the site).

The overall proposal seeks planning permission for the erection of two buildings, one on each site, to be used largely for residential purposes through the addition of 100 residential units, and also including a relocated replacement library with a slightly larger floorspace.

The proposed development of the Falling Lane site seeks permission for a part two, three, four and five-storey residential building which steps up in height from east to west. The proposed building would have a maximum height of 16.7 metres (17.5 to the top of the rooftop balustrade), and would comprise of 50 flats; 18 one-bedroom, two-person units, 18 two-bedroom, three-person units, 6 two-bedroom, four-person units (24 two-bedroom units in total) and 8 three-bedroom, four-person units.

The ground floor would be used for a mix of purposes, with approximately half used for undercroft car parking with residential uses in the south-east corner, alongside cycle parking, buggy storage, bin storage, a communal garden and a residential foyer. Additionally, the first floor two-bedroom flats facing out onto Falling Lane would have internal staircases which lead to residential entrances at ground floor level. At ground floor level, 13 car parking spaces (including 5 wheelchair accessible spaces) are proposed for residential use and 15 car parking spaces (including 2 wheelchair accessible spaces) are proposed for use by Rabbsfarm Primary School. Parking for the different users would be separated into two undercrofts with a security gate preventing public access into the main part of the building.

The proposed Otterfield Road building would also have a varied height, appearing as a part three, four, five and six-storey building with a maximum height of 18 metres (19.3 metres including the rooftop parapet and railings). The proposed massing seeks to have the tallest

elements towards the south of the site, at six-storeys, the middle of the site would be three-storeys and the north of the site would be five-storeys resulting in an up-and-down stepped appearance, similar to the design rationale proposed at the Falling Lane site.

The ground floor of the proposed Otterfield Road development would be predominantly for residential use, however would also contain a new 312 sqm library within the southern part of the building, to replace the 276 sqm library that would be demolished at the Falling Lane site. At first floor level and above, only residential uses are proposed, and the building would comprise of 50 flats; 24 one-bedroom, two-person flats, 13 two-bedroom, three-person flats, 6 three-bedroom, four-person flats and 7 three-bedroom, five-person flats (13 three-bedroom units in total). A total of 23 residential car parking spaces and 2 wheelchair accessible spaces for the library are proposed, to be laid out around the northern and eastern edges of the building, to be accessed from the road connecting Otterfield Road and the Fairfield Road car park.

The proposed affordable housing would all be delivered on the Falling Lane site and comprises of:

50% on site Affordable Housing (50 units) to be delivered as London Affordable Rent (LAR) dwellings;

- 18 one-bedroom units
- 24 two-bedroom, units
- 8 three-bedroom units.

### **3.3 Relevant Planning History**

18344/APP/2013/3564      Former Yiewsley Swimming Pool Site & Part Fairfield Car Park    Otter  
Redevelopment of site to provide mixed use development including one three-storey block comprising health centre and gym; one two-storey block comprising 12 supported housing/living flats and associated accommodation; car parking; landscaping; and ancillary development.

**Decision:** 18-03-2014    Approved

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

The planning history set out above indicates that the Otterfield Road site was formerly occupied by an indoor swimming pool, and following demolition, a proposal for a mixed-use development up to three-storeys in height, comprising 12 supported housing/living flats, a health centre and gym was granted approval on the 6th June 2014 (Ref: 18344/APP/2013/3564). This scheme was never implemented, and the permission has now lapsed, however the planning history is a relevant material consideration.

## **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 London Plan (2021)  
The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2021), Planning Practice Guidance, as well as relevant supplementary planning documents and guidance are all material consideration in planning decisions.

The proposed development has been assessed against development plan policies and all relevant material considerations.

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

The following Local Plan Policies are considered relevant to the application:-

##### **Part 1 Policies:**

PT1.BE1	(2012) Built Environment
PT1.CI1	(2012) Community Infrastructure Provision
PT1.E5	(2012) Town and Local Centres
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM6	(2012) Flood Risk Management
PT1.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
DMAV 2	Heathrow Airport
DMAV 3	RAF Northolt
DMCI 1	Retention of Existing Community Sport and Education Facilities
DMCI 2	New Community Infrastructure
DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation

DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMEI 6	Development in Green Edge Locations
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 4	Residential Conversions and Redevelopment
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 3	Locally Listed Buildings
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
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 D2	(2021) Infrastructure requirements for sustainable densities
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 G3	(2021) Metropolitan Open Land
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 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 HC1	(2021) Heritage conservation and growth
LPP S1	(2021) Developing London's social infrastructure
LPP SD1	(2021) Opportunity Areas
LPP SD6	(2021) Town centres and high streets
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 T2	(2021) Healthy Streets
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
LPP T7	(2021) Deliveries, servicing and construction

## **5. Advertisement and Site Notice**

**5.1** Advertisement Expiry Date:- **15th January 2022**

**5.2** Site Notice Expiry Date:- **11th January 2022**

## **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. A re-consultation also took place following receipt of amended plans. This consultation is ongoing and ends on 18th February 2022.

The addendum report will set out the total numbers of comments received.

To date, the council have received comments from 320 neighboring households. Some households have also lodged multiple comments. 1 comment of support has been received, and 319 comments of objection.

3 petitions have also been received, of these, one is a live petition which closes on 18th February, further details of the total number of signatures on this live petition will be reported via the committee addendum. The other two petitions gathered 129 and 70 signatures respectively.

The comments received are summarised below:

- overdevelopment
- lack of GP facilities, dentist surgeries, leisure facilities and school places and other infrastructure/services
- disruption to library services in Yiewsley
- increased traffic and parking problems
- poor air quality
- excessive height proposed/taller than surroundings
- out of character with area
- loss of privacy/overlooking
- loss of library
- increased crime
- insufficient parking for proposed development
- loss of health centre
- increased anti social behaviour
- do not need more flats
- lack of safe green space for children
- lack of visitor parking
- ward is overpopulated
- should provide social housing
- provide enhanced pedestrian and cycling
- need improvements to high street and retail offer
- litter and refuse
- noise
- construction vehicles
- application documents refer to 2019 evidence
- how can the council achieve net zero carbon by building more homes
- overshadowing of park
- loss of green space
- loss of primary school overflow car park
- more trees needed
- loss of public land
- loss of light
- highway safety concerns
- proximity to main junction
- impact on wildlife/biodiversity and ecology
- loss of trees
- replacement library needs to be larger
- danger of construction vehicles and local school causing conflict
- impact on locally listed building and its structure
- impact on skyline
- flooding and drainage problems locally
- insufficient staff and visitor parking for the Library

## OTHER MATTERS

Many of the objections received raise objections to matters which are not material planning considerations such as covenants and land appropriation and depreciation of house prices.

## WEST DRAYTON GARDEN CITY RESIDENTS ASSOCIATION

Object to the scale and composition of this proposed development. Firstly, I would like to state that we are pleased to see that the replacement library will be slightly larger than the existing library. However, given the previously extensive public amenities available across the two sites (e.g. the gym above the library), and those suggested in previous development plans, we do not feel that the current proposal offers sufficient benefit to the community. We see this as a significant over-development of the site, with buildings of great mass and density, not in character with other buildings, and higher than all other neighbouring buildings. The plans also propose a significant increase in the number of flats compared to the previous planning application, approved in March 2014. The scale of the proposed development would have a major impact on local roads, with both Fairfield Road and the (very narrow) Otterfield Road already congested. Otterfield Road residents would also experience a considerable amount of overlooking from the swimming pool site flats, and would have the bins of those flats close to their gardens. We welcome the fact that 50% of flats are affordable, but only thirty five are designated as social housing, which is where need is greatest. If permission is granted, even more pressure will be put on services such as local GP capacity and secondary school places. There is a strong case to be made that these two sites should be part of the solution to this lack of local services. This is before we come onto the question of the covenants on the swimming pool site intended to ensure that it should always be used for recreational purposes. There has been a massive increase in the number of flats in Yiewsley and West Drayton in recent years, with very little increase in local services. We understand that a level of development is necessary to fund amenities, but ask that the council consider putting far more emphasis for these sites on services for the fast-growing local community.

## TRANSPORT FOR LONDON

TfL has no objection to proposals with respect to the following comments:

### Car Parking - both sites

- It is noted that residents would be able to park on street in surrounding roads given the area is not within a CPZ. Details of the blue badge space, to be retained in perpetuity, should be secured by way of condition. Please provide any details of electric vehicle parking spaces. A section 278 agreement with the borough will be required to establish the new vehicle access for the Falling Lane site. The parking should be managed by way of a Parking Management Plan that should be retained via condition.

### Cycle Parking - both sites

- London Plan (2021) policy T5 sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. The cycle spaces should meet the requirements of the London Cycle Design standards, alongside the LP minimum standards.

### Yiewsley Library Site (Falling Lane)

- 88 double-stacked parking spaces are proposed to be provided, 2 single-tier spaces are proposed for larger spaces provided within two separate secure ground floor stores, a total of 90 spaces will be provided. Please clarify if the single tier spaces will be "Sheffield" type, TfL supports Sheffield stands provided in line with the London Cycle Design standards and policy T5. 2 spaces for adaptive cycles are proposed. 90 spaces in total is in line with London Plan T5 standards. 3 short stay

"Sheffield" type cycle parking spaces are proposed, this is acceptable in accordance with table 10.2. These cycle parking details should be secured via condition.

#### Otterfield Road Site (Swimming Pool Site)

- Cycle parking for the development will be provided in the form of Sheffield Stands. These will be located in three dedicated bicycle stores capable of accommodating 88 bicycles for the residential units, and these will be accessed from separate external doors, next to the main entrances to the buildings. A further 10 short stay outdoor cycle spaces will be provided for the public library. These cycle parking details should be secured via condition.

#### Both Sites

- Travel Plans were provided with the submitted application. These should be retained via condition.
- No places of worship have been identified within the distances and travel times within both Transport Assessment Tables (Table 3.3). There are Mosque and Church facilities within close proximity to the site, these travel times should be included.
- A full Construction Logistics Plan (CLP) is to be produced in line with current TfL CLP guidance, this document should be secured as part of any permission and must consider the safety of road users in the vicinity, in particular pedestrians, cyclists and buses and to assess any impacts on the road network. Adequate measures must be provided to ensure safety and construction traffic movements must be planned to minimise impact during the peak hours. No construction vehicles shall block bus stops and safe passage for buses shall be maintained at all times along the High Street.
- Information regarding deliveries and servicing, including how the impacts particularly on vulnerable road users will be minimised and managed, should take the form of a Delivery and Servicing Plan (DSP) for both sites, which should be secured by condition.

#### METROPOLITAN POLICE

No comments received.

(OFFICER COMMENT: The standard Secure By Design condition will be imposed to ensure each development achieves Secure By Design accreditation)

#### GLAAS

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The proposed development site does not lie within an archaeological priority area and has very low archaeological potential indicated by the few recorded finds in the vicinity and disturbance by modern development. No further assessment or conditions are therefore necessary.

#### HEATHROW AIRPORT LIMITED

No comments received.

#### MINISTRY OF DEFENCE

I can confirm the MOD has no safeguarding objections to this proposal.

#### NATS (NOV 21)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company

("NERL") has no safeguarding objection to the proposal.

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

#### LONDON FIRE BRIGADE

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.

#### THAMES WATER

No objection subject to imposition of standards informatives.

#### CCG/HEALTH

No comments received.

(OFFICER COMMENT: Whilst no comments have been received, the Council has been able to establish the necessary Health contribution by using the HUDU database. The development generates a sum of £65,689 which will be secured to deliver improvements to local health care services.)

#### **Internal Consultees**

##### POLICY TEAM

##### Proposed Development

The proposal seeks to demolish the existing library and replace it with a new development of 50 Affordable rented residential units. A new library and 50 market units will be provided on the former Yiewsley Pool site.

##### Policy Designations/ Allocations

The proposed sites are not allocated in the Local Plan for development and can be classed as windfall development.

Both sites are located adjacent to Metropolitan Open Land (MOL), a designation that covers most of the Yiewsley Recreation Ground. However, a small proportion of Site 1 includes an area of the Recreation Ground that is not designated as MOL but would be defined as public open space according to Local Plan policy DMCI 3. Site 2 is an area of previously developed land boarded up since the demolition of the swimming pool buildings. It is not subject to any planning policy designations.

##### Principle of Development

##### Site 1 (updated)

Policy DMCI 1 of the Local Plan states that proposals involving the loss of an existing community facility such as the existing Yiewsley library will only be permitted where it can be demonstrated that the specific use is no longer required on-site, will not lead to a shortfall in the provision, is no longer in demand or appropriate, or replacement/ relocated facilities provide at least the same level of accessibility as the existing facility. Whilst the proposed redevelopment of this site would lead to the loss of the library from its High Street location, the scheme as a whole does make provision for a new library on Site 2. It is noted that there will be a significant 43% reduction in the total size of the

library provision from 553m2 to 311m2. The application does not provide any specific details on how this reduced level of provision will continue to meet the local community's needs and whether the same level of accessibility will be provided. It is noted that the new library will be further from the High Street and the proposed accesses look to be of poor quality and legibility. Access improvements should be considered as part of the design or through planning obligations.

Subject to further information on the two points queried above, it is considered that the library's relocation could accord with the requirements of policy DMCI1. The reprovision of the library will need to be secured by a relevant planning obligation to ensure that the replacement library is delivered before the commencement or completion of a proportion of residential units.

There are no policy issues concerning the principle of new residential development on this site.

#### Site 2

The comprehensive redevelopment of Site 2 as previously developed land is supported by the Development Plan.

#### Tall Buildings (New) - Site 2 Only

London Plan policy D9 and Local Plan Part 2 Policy DMHB10 together define tall buildings as those which:

- Are over six storeys or 18 metres in height
- Are substantially taller than surrounding buildings
- Will significantly alter the skyline

Officers have determined that the proposed building meets all three criteria, making it tall in policy terms.

LPP2 policy DMHB 10 directs tall buildings to Hayes and Uxbridge town centres as suitable locations or other areas identified by the Borough. This site is not within these specified locations and conflicts with London Plan policy D9 and Local Plan policy DMHB 10. Thus, evidence is required to allow the impacts of the building to be assessed. The outcome of this assessment will determine the weight to give to the policy conflict in the overall planning balance.

#### Affordable Housing - Sites 1 and 2

As a scheme on public sector land, policy H5 of the London Plan sets a threshold of 50% provision. Whilst the proposed development meets the fast-track for affordable housing in terms of the overall percentage provided, policy H5 also requires the proposed development to be consistent with the relevant tenure split, which is 70% social/ affordable rent and 30% intermediate. The proposed development is not consistent with this tenure split in that all of the proposed affordable housing is London Affordable Rent. However, policy H6 of the London Plan does state that the Fast Track (i.e. non-viability tested route) is available to those applicants that elect to provide low-cost rented homes in place of intermediate homes.

The Council's recently adopted Housing Strategy (2022) does highlight on page 29, p5 that more than three-quarters of those requiring affordable housing can only afford low-cost rented products such as Social Rent and Affordable Rent which would support the proposed tenure mix.

The provision of affordable housing on only one site does raise concerns in terms of the time of delivery that will need to be addressed through relevant planning obligations. Such an obligation will need to ensure that the delivery of affordable housing is secured ahead or in parallel with the completion of the market housing.

#### Housing Mix - Sites 1 and 2

Site 1  
18 - 1 - beds  
24 - 2 beds  
8 - 3 beds

Site 2  
24 - 1 beds  
13 - 2 beds  
13 - 3 beds

Policy DMH2 requires a mix of housing units to reflect the Council's latest information on housing needs. The Council's latest evidence of housing need indicates a substantial borough-wide requirement for larger affordable and private market units, particularly three-bedroom properties. However, both sites have a PTAL rating of 3, are within the town centre and walking distance of the new Elizabeth Line Station. In line with Policy H10 of the London Plan, this would typically indicate that a proportion of three bedrooms units of 21% would be acceptable based on other recent applications in similar contexts.

#### Private Amenity Space - Sites 1 and 2

The Design and Access Statement describes that the overall level of private amenity space will exceed the policy requirements of the Local Plan (DMHB 18); however, no figures are provided against which this statement can be verified.

#### Public Open space - Sites 1 and 2

Policy DMCI 4 outlines that proposals for major new residential development must provide new or enhanced public open space. It is not clear from the submitted plans what additional public open space has been provided.

In the absence of any new public open space, the schemes will be required to make financial contributions to improving other public open spaces following the Planning Obligations SPD.

#### Urban Greening Factor (New)

Site 1 - UGF - 0.38  
Site 2 - UGF - 0.3

Policy G5 of the London Plans recommends a target score of 0.4 for predominantly residential developments. The level of greening on Site 2 does seem relatively low and efforts to increase green landscaping on site should be sought or else a justification provided for the lower score such as the need to maintain access to the library and the close proximity to a large open space.

#### Planning Obligations

In addition to the potential obligations identified within these comments, a Health contribution should be considered for those affordable units eligible for a social housing CIL exemption. The need for new Health facilities in Yiewsley is identified in the SIDP, which supported the Local Plan Part 2. The appropriate amount can be calculated using the HUDU model, available through the Planning Obligations team.

#### CONTAMINATED LAND OFFICER

##### 1 Summary of Comments:

I have reviewed the following documents which were submitted with the application:

· Report title: Preliminary Risk Assessment of Proposed Yiewsley Health Centre, Otterfield Road West Drayton; Ref: F13/146109/PRA; Date: January 2014; Prepared: CET Infrastructure.

· Report title: Phase II Generic Human Health Risk Assessment of Proposed Yiewsley Health Centre, Otterfield Road West Drayton; Ref: F14/146109/GRA; Date: January 2014; Prepared: CET Infrastructure.

· Letter report title: Proposed Yiewsley Health Centre, Otterfield Road - Waste Classification Hazard Assessment; Ref: F13/1/HA; Date: 17th January 2013 [sic]; Prepared: CET Infrastructure.

The abovementioned reports were produced in 2014 in support of an earlier application concerning the Otterfield Road site, and the details therefore now require updating, particularly in terms of chemical data assessments and interpretation of other associated geo-environmental findings.

It is considered likely the updated information could possibly lead to recommendations for remediation, (in the form of a Remediation Method Statement (RMS)), to ensure the land will be suitable for the proposed change of use to residential (and commercial) properties.

The updated details should be produced in accordance with current guidance from the Environment Agency (Land Contamination Risk Management [published 8th October 2020 and updated 19th April 2021]).

Furthermore, the submitted reports (as detailed above) do not include any geo-environmental details or risk assessments which refer to the Falling Lane site.

I therefore recommend the following conditions to be imposed if planning permission is awarded:

Proposed conditions for land that may be affected by contamination.

(i) The development/s shall not commence until a further and, as appropriate, updated scheme/s to deal with contamination have 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 desk-top study, for the Falling Lane site, is to be conducted by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;

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

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

(d). An updated summary of the previously conducted site investigation, including the recorded 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

(e) A written method statement providing details of the remediation scheme/s, including details of how 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/s is identified an addendum to the remediation scheme/s 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/s are submitted to and approved by the LPA. The report/s shall include the details of the final remediation works and their verification to show that the works at each site 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/s. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development/s 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.

2 Reason for Refusal (if objecting):

N/A

3 Observations:

The submitted reports outline the results of chemical analyses which include (but are not limited to) the following substances:

- Lead
- Benzo(a)pyrene

The recorded values of these and any other identified substances (as applicable) require to be reviewed and their assessment/s revised and reported in accordance with current assessment criteria and methodology.

Based on the outcome of work to update the earlier reports as submitted with this application, it may be considered appropriate and/or necessary to revisit the Otterfield Road site and conduct a further site investigation in order to obtain further and more current data.

FLOODING OFFICER/LLFA - Revised report comments (FEB 22):

The applicants have set out in an FRA and Drainage Plan by Infrastruct CS dated Rev B Feb 2022. Q bar is indicated to be 0.7ls and the proposals have been refined to indicate there is no run off from the site as this can be managed by infiltration. The proposed method to control surface water is now through a green roof and permeable paving and soakaways which is better, though further above

ground techniques could have been used integrating with the proposed landscaping. No cross sectional detail is provided of the green road and how this will work and the initial flush of water that this will control.

#### ACCESSIBILITY OFFICER (NOV 21)

"With the exception of the paragraph on evacuation measures, the commentary provided on page 45 of the Design and Access Statement presents a standard of accessibility that is acceptable for a development of this size and scale.

1. A drop off point that is convenient for large door to door transport vehicles, including Dial a Ride, ambulance and taxi vehicles should be sited in close proximity to the library and residential entrances
2. The undercroft car parking should achieve a height clearance of 2.6m to cater for high sided vehicles.
3. Dwellings for sale on the open market should meet the minimum standards required for a wheelchair adaptable home, with all social rented dwellings constructed to a wheelchair accessible standard.
4. Plans should be amended to demonstrate how the required M4(2) and M4(3) units satisfy the functional and spatial provisions for wheelchair adaptable and wheelchair accessible housing.
5. An accessible parking space should be allocated to each of the required wheelchair accessible/adaptable dwellings, with a 1200 mm wide transfer area provided alongside. These units should be interspersed throughout the development, and each should be served by two lifts.
6. Electric vehicle charging points should serve a proportion of the accessible parking bays.
7. To ensure the requisite standards are met, particular attention should be paid to the clear access zones and spatial requirements within entrance lobbies, kitchens, bedrooms and bathrooms.
8. The dimensions of some bedrooms within the assumed wheelchair standard accommodation falls below the minimum dimensions for an M4(3) unit. 13.5m<sup>2</sup> should be achieved within the principal double bedroom. Single bedroom should achieve a minimum area of 8.5m<sup>2</sup> and a minimum of 1000mm to one side of a single bed and all furniture.
9. The remaining units (90%) need to demonstrate compliance with the standards for a Category 2 M4 (2) dwelling as set out in the SPD referred to above.
10. All new developments are required to ensure reliable, convenient and dignified means of escape for all building users in accordance with London Plan policy D5 and D12. Accordingly, 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. Details should be provided on how this provision will be met. It is unacceptable to provide a refuge as the only means of escape for persons unable to use a stair.
11. Details are 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.

(OFFICER COMMENT: A detailed response was issued to the points raised in the above consultee comments and these are set out below and considered to address the issues raised, subject to the imposition of conditions:

1. A drop off point that is convenient for large door to door transport vehicles, including Dial a Ride, ambulance and taxi vehicles should be sited in close proximity to the library and residential entrances.

RESPONSE: Falling Lane has public road access along two elevations, providing access from both entrance points. Otterfield Road site is fully accessible for large vehicles (within the on-site car parking area).

2. The undercroft car parking should achieve a height clearance of 2.6m to cater for high sided vehicles.

RESPONSE: 2.6m clear headroom is achieved in the undercroft.

3. Dwellings for sale on the open market should meet the minimum standards required for a wheelchair adaptable home, with all social rented dwellings constructed to a wheelchair accessible standard.

RESPONSE: On both sites 10% of the dwelling are designed to comply with M4(3) requirements with all other units complying with M4(2).

4. Plans should be amended to demonstrate how the required M4(2) and M4(3) units satisfy the functional and spatial provisions for wheelchair adaptable and wheelchair accessible housing.

RESPONSE Further information on a typical M4(3) unit with satisfactory functional and spatial provisions can be found on the Design & Access Statement.

5. An accessible parking space should be allocated to each of the required wheelchair accessible/adaptable dwellings, with a 1200 mm wide transfer area provided alongside. These units should be interspersed throughout the development, and each should be served by two lifts.

RESPONSE: In both sites, designated parking spaces are provided for each wheelchair user unit. 1200mm transfer area provided in line with Part M of the Building Regulations.

6. Electric vehicle charging points should serve a proportion of the accessible parking bays.

RESPONSE: On both sites, 20% of proposed parking spaces are proposed to be active electric car charging points and the remaining 80% are passive charging points. Charging points to be proportionally distributed amongst all bays.

7. To ensure the requisite standards are met, particular attention should be paid to the clear access zones and spatial requirements within entrance lobbies, kitchens, bedrooms and bathrooms.

RESPONSE: All units have been designed to achieve spatial requirements of Part M Approved Document of Building Regulations.

8. The dimensions of some bedrooms within the assumed wheelchair standard accommodation falls below the minimum dimensions for an M4(3) unit. 13.5m<sup>2</sup> should be achieved within the principal double bedroom. Single bedroom should achieve a minimum area of 8.5m<sup>2</sup> and a minimum of 1000mm to one side of a single bed and all furniture.

RESPONSE: All wheelchair units meet the minimum spatial standards and dimensions as per Building regulations.

9. The remaining units (90%) need to demonstrate compliance with the standards for a Category 2 M4 (2) dwelling as set out in the SPD referred to above.

RESPONSE: The remaining units have been designed in compliance with the standards set for a M4(2) dwelling by Approved Document Part M.

10. All new developments are required to ensure reliable, convenient and dignified means of escape for all building users in accordance with London Plan policy D5 and D12. Accordingly, 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. Details should be provided on how this provision will be met. It is unacceptable to provide a refuge as the only means of escape for persons unable to use a stair.

RESPONSE: Fire strategy is based on providing evacuation lifts.

All stair cores within both buildings are provided with at least one lift serving each floor; at least one of these lifts will be an evacuation lift.

The evacuation lift in each core is to be designed to meet the following requirements:

- The evacuation lift is to remain operational during a fire and can be operated independently by an occupant

- A secondary power supply is to be provided to the evacuation lift to ensure the lift remains available for use in the event of loss of power

The lifts are to be designed and installed in accordance with BS EN 81-20 and BS EN 81-70, with a manual recall (firefighters) switch provided.

Please refer to point 3.1.1 of Fire Statement produced by Fire consultant.

11. Details are 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.

RESPONSE: At this stage of design, no details of playground area have been provided. Our

recommendation is to be secured by adequate planning conditions.  
The proposed site plan allows for step free access to the playground area.)

#### ACCESSIBILITY OFFICER FURTHER COMMENTS FEB 2022

The amendments to the scheme have been reviewed the following conditions should be attached to any approval:

1. The dwellings hereby approved shall, as a minimum standard, 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 allow the Building Control body to check compliance of the development against the optional Building Regulations standards, and ensure an appropriate standard of housing, in accordance with policy D7 of the 2021 London Plan.

2. The dwellings hereby approved shall ensure that three, two bed units are constructed to meet the standards for a Category 3, M4(3)(2)(a) Wheelchair Adaptable Standard 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 allow the Building Control body to check compliance of the development against the optional Building Regulations standards, and to ensure an appropriate standard of housing, in accordance with policy D7 of the 2021 London Plan.

3. The dwellings hereby approved shall ensure that three, two bed units are constructed to meet the standards for a Category 3, M4(3)(2)(b) Wheelchair Accessible Standard 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 allow the Building Control body to check compliance of the development against the optional Building Regulations standards, and to ensure an appropriate standard of housing, in accordance with policy D7 of the 2021 London Plan.

4. All Wheelchair Accessible Standard M4(3)(2)(b) and Wheelchair Adaptable Standard M4(3)(2)(a) units shall each be allocated an accessible parking space, capable of accommodating a high sided vehicle, designed to accord with the specifications set out in BS 8300:2018 which shall remain in place in perpetuity.

**REASON:**

To allow the Building Control body to check compliance of the development against the optional Building Regulations standards, and to ensure an appropriate standard of housing, in accordance with policy D7 of the 2021 London Plan.

5. The development hereby approved shall accord with London Plan policy D5(B5) and D12(A) to include a minimum of one fire evacuation lift per block designed to meet the technical standards set out in BS EN 81-76, BS 9991 and/or BS 9999, as shown on drawing number M9534- APL107 and M9534- HUN- DR- APL204. The evacuation lift required within the Falling Lane and Otterfield Road buildings shall serve all floors and remain in place for the life of the development.

6. Prior to occupation, the type and location of accessible play equipment for disabled children, to include sound tubes, colour and lighting canopies, and/or other play equipment that can stimulate the olfactory senses, shall be submitted to, and approved in writing, by the Local Planning Authority.

**REASON:**

To ensure the development provides inclusive play for all children, including those with complex

multiple disabilities, in accordance with London Plan policy D5 .

(OFFICER COMMENT: All conditions would be attached to any grant of consent.)

#### WASTE STRATEGY TEAM (Summary of application comments)

No objections to Otterfield Road bin collection arrangements.

Concerns were initially raised regarding Falling Lane bin collection. Requested for the Falling Lane site refuse collection points be as far away from the junction as possible. Requested no more 12 metres maximum pulling distance for the refuse crew. Stated a preference is for all bins to be together and a last resort to use caretakers to move bins back and forth on collection day.

OFFICER COMMENT: In order to resolve the Falling Lane arrangements, the applicant has agreed to implement a managed refuse collection system, whereby a caretaker would move bins on collection day. This will be secured by way of a condition and the arrangement will be required to be retained in perpetuity on the Falling Lane site. There is now only one refuse collection point which is positioned away from the junction. The use of a caretaker would in effect ensure a co-ordinated and well managed approach to bin collection occurs. Maximum pulling distance would not be exceeded.

#### AIR QUALITY OFFICER - REVISED REPORT COMMENTS FEB 2022

##### Summary of Comments

The proposed development is located within the LBH Air Quality Management area (AQMA), with Falling Lane within the West Drayton/Yiewsley Focus Area (FA), and Otterfield Road within the FA catchment area, bringing additional traffic emissions which will add to current likely exceedances.

As per the London Plan and LBH Local Action Plan 2019-2024, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of air pollutant emissions in these sensitive locations. 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 DME1 14 of the emerging 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. Finally, the London Plan (March 2021) requires development to be air quality neutral as minimum and air quality positive in certain circumstances, actively contributing to reduce pollutant emissions to the atmosphere.

The development is not Air Quality Neutral and further action is required to reduce emissions.

##### Damage costs and mitigation

Mitigation measures to reduce emissions can be applied on-site or off-site. Where this is not practical or desirable, pollutant off-setting will be applied. The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach.

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.

The level of mitigation required to the proposed development for traffic emissions is £61,752. Once all deductions were applied, the remaining value of mitigation due is £18,526. Flat rate deductions applied are as follow: Travel Plan (15%), Green Sustainable Measures (5%), contribution to long term LBH strategic long-term strategies (50%), totalling a reduction of £43,226.

Therefore, a section 106 agreement with the LAP of £18,526 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.

## 2 Reason for Refusal (if objecting)

N/A

## 3 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 Planning Guidance requirements
- 2) the implementation of electric vehicle charging bay. This is to be implemented in line with the minimum number of charging points required in the London Plan.
- 3) a clear and effective strategy to encourage staff / 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 DME1 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(e), 186 and 188 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.

## LANDSCAPE OFFICER - REVISED PLAN COMMENTS FEB 21

### 1.0 YIEWSLEY LIBRARY, FALLING LANE SITE

#### 1.1 TREE REPORT

An amended tree report by Trevor Heaps, dated 1 February 2022, incorporates an arboricultural impact assessment (AIA), arboricultural method statement (AMS) and tree protection plan (TPP). The report confirms that 10 trees will be removed to enable the development. Trees to be removed include 1 x A grade (T5), 4 x B (T1,T3,T4,T8 and S10) and 4 x C grade trees (of lower quality).

It also confirms that if the proposal is implemented in accordance with the recommendations in the report, no further trees will be adversely affected.

#### 1.2 LANDSCAPE LAYOUT

According to Hunter's D&AS addendum (2.1) the proposed Rabbsfarm School allocated parking in the north-east corner of the site have been removed in order to retain the land within the Recreation Ground. Rabbsfarm parking and the residents parking bays have been amended to clearly differentiate the two. Otherwise, the site layout in terms of hard and soft landscape remains largely unchanged.

#### 1.3 URBAN GREENING FACTOR

Hunter's drawing ref. M9534-HUN-A-UGF001 (Rev. A) presents an UGF calculation of 0.38, marginally under the GLA target score of 0.4.\*

### 2.0 YIEWSLEY POOL SITE:

#### 2.1 TREE REPORT

An amended tree report by Trevor Heaps, dated 1 February 2022, incorporates an AIA, AMS and TPP. The report confirms that the development is within influencing distance of several trees, however, if the proposal is implemented in accordance with the recommendations set out in the report no further trees will be adversely affected.

#### 2.2 LANDSCAPE LAYOUT

Hunter's addendum to the D&AS (3.1) confirms that car parking spaces have been reduced from 35 to 25. In the north-west corner of the site there is to be a new direct footpath link between the site and the recreation ground.

#### 2. URBAN GREENING FACTOR

Hunter's drawing ref. M9534-UGF002 (Rev. A) presents an UGF calculation of 0.3, which is the GLA's recommended target for commercial developments.\*

### 3.0 \*ILLUSTRATIVE PARK ENHANCEMENTS

A shortfall in usable amenity space and Urban Greening Factor scores will be mitigated by the proximity of both sites to the Recreation Ground. This open space is to benefit from new landscaped gardens, a new skate park, a new play area and new / replacement tree planting. The masterplan for the park has been developed in consultation with the Green Spaces Manager.

#### RECOMMENDATION

No objection subject to pre-commencement condition RES8 (Construction Management Plan - to incorporate tree protection measures and arboricultural method statement recommendations), and RES9 (parts 1,2,3,4,5 and 6) and RES10.

#### ENERGY/ECOLOGY COMMENTS

Neither of the proposed development sites comprising the wider application boundary achieve the zero carbon requirements onsite as set out in the London Plan. Consequently it has been advised that there is a need for an offsite contribution to the Council's Carbon Offset Fund. These equate to Otterfield Road - £27,360  
Falling Lane - £22,230

It must be noted that the calculations in the energy strategy are inaccurate as it incorporates the out of date carbon pricing of £60/tCO<sub>2</sub> as opposed to the price adopted at the start of 2021 of £95/tCO<sub>2</sub>. Furthermore, the energy strategy is very broad and is heavily reliant on photovoltaic panels that are not sufficiently detailed to enable an understanding of the final type, size, orientation or fitting and in turn how the carbon savings will be achieved. The following condition is therefore necessary:

##### Condition:

Prior to above ground works, a detailed energy scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out the detailed energy performance of the buildings in line with the London Plan requirements. The scheme shall demonstrate the baseline emissions (i.e. the development assessed to the requirements of Part L Building Regulations) and then how the following savings over the approved baseline will be achieved:

Otterfield Road - 82% saving over baseline  
Falling Lane - 84% saving over baseline

This is in accordance with the submitted energy strategy by QODA, September 2021.  
The development must proceed in accordance with the approved plans unless otherwise agreed in writing with the Local Planning Authority.

##### Reason

To ensure the development complies with the London Plan and zero carbon requirements.

##### Ecology

I have no objections to the proposed development in relation to ecology.  
The following condition is required on the Otterfield Road Site:

##### Condition:

Prior to the commencement of development a badger survey shall be conducted to determine the presence or absence of badgers. The findings of the report and the methodology used to ascertain the presence of badgers shall be submitted to and approved by the Local Planning Authority. The report shall also set out recommendations and method statements necessary to protect badgers and badger setts. The development of Otterfield Road shall be in accordance with the approved recommendations and method statements.



Reason:

To ensure the development protects a notable species of interest in accordance with the London Plan and the Local Plan.

OFFICER COMMENT: The recommended condition expands the above text to include various ecological enhancements.

HOUSING OFFICER:

My comments on the Falling Lane planning application Ref 76795/APP/2021/3704 are as follows.

The planning application complies with policy H5 of the London Plan by meeting the requirement for 50% affordable housing on public sector land.

This Council development has been designed to address the local demand for affordable housing as required by policy DMH2. Lo-cost rented affordable housing is identified as the tenure in highest demand in the Hillingdon Housing Strategy to meet this demand the proposed tenure of the 50 units in the Falling Lane block will be 100% London Affordable Rent.

This does not comply with the policy requirement for a mix of 70% rented and 30% intermediate units, but it compensates for the fact that on many private developments the affordable housing delivered is based on financial appraisals and to meet the overall 35% affordable housing requirement often includes a much higher level than 30% intermediate units.

The Council has a duty to house applicants on the Housing Register and very few of these households can afford to access intermediate housing. Across the borough there is very good supply of intermediate housing, a range of Shared Ownership units, Discount Market Sale units and London Living Rent units with eligibility requirements that require minimum household incomes of £30,000 up to maximum household incomes of £90,000.

This application will deliver 100 residential units in total, of these 21 units will be 3 bedroom homes, meeting the Policy H10 of the London Plan of 21% by unit, but below that level calculated on habitable room basis. A higher level of 3 bedroom homes would be preferable, and but this unit mix addresses the demand for larger family homes in both affordable and private tenures. The overall mix by unit is 42% 1 bedroom flats, 37% 2 bedroom flats and 21% 3 bedroom flats.

The Otterfield Road section of the site will be sold and deliver private market housing and securing a capital receipt and a new library for the Council.

FURTHER COMMENTS:

To illustrate the high demand for lo-cost rented accommodation in comparison to the demand for intermediate housing.

There are currently 2,738 households on the Housing Register, of which 1,995 were in Band A or B of these 428 households are in temporary accommodation of which 169 were in B&B. In addition, a further 87 were rough sleepers were in emergency accommodation.

In addition to the known pipeline of lo-cost rented units that will be delivered via S106 housing and the Council's own development programme the Draft Housing Commissioning Plan indicates an estimated 426 units of lo-cost rented housing are required in the five year period 2021/22 and 2025/26.

Estimated five year need for rented units over and above the known pipeline of rented affordable housing

The estimated annual affordable housing requirements over the five year period 2021/22 to 2025/26

are summarised below:

Bedsizes: Average Annual additional supply requirement

1 bed: 207

2 bed: 75

3 bed: 112

4 bed: 32

TOTAL: 426

Demand for intermediate housing

There are 472 households on the Hillingdon Shared Ownership Register seeking shared ownership or other intermediate housing, again the need is set out below:

Bed size need: Applicants

1 bed: 126

2 bed: 218

3 bed: 128

Total: 472

HIGHWAYS OFFICER COMMENTS (Summary of November 2021 comments):

The site achieves an average/fair PTAL rating of 3.

The Mayor of London adopted a new and revised London Plan in March 2021, consequently the car parking standards set out in the London Plan 2021 which are restricted in line with levels of existing and future public transport accessibility and connectivity, take precedence over those of the Local Development Plans of Local Authorities except where local Development Plans specify lower local maximum standards.

The maximum residential car parking standards set out in the London Plan Policy T6: Table 10.3 are predominately lower than the maximum parking standards set out in the Hillingdon Local Plan: Part 2 Development Management Policies (2020) and so the London Plan parking standards take precedent.

The maximum parking standards outlined in the London Plan Table 10.3: Outer London PTAL 2-3, 1-2 beds it is up to 0.75 space per dwelling and 3 bed or more it is 1 space per dwelling, also both have a 1 cycle/bed requirement.

Any on-site car parking in excess of the London Plan parking standard will not be supported, however given there is regulated on-street parking controls through extensive double and single yellow lines and Residents' Parking Permit schemes surrounding the site (Y1 and Y2 Mon-Fri 8.30am -5pm), car free or reduced level of on-site car parking are suitable in such controlled locations particularly since the London Plan parking standards now prohibit/discourage any residential development car parking where conditions permit.

The applicant has shown cycle parking stores by use of two-tier bike racks, the use of such stands are generally not acceptable for new residential developments, many of these styles are difficult to use when bicycles are fitted with baskets and child seats and usually require lifting. This can be difficult for the less able or those with heavy bicycles, therefore a mix of parking facilities is recommended with the majority of the easy to access type like Sheffield cycle racks.

Where car parking is provided in new developments, provision should be made for infrastructure for electric. 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.

For residential development, car parking areas must include 10% of spaces suitable for a wheelchair user in accordance with the provisions in the Council's Accessible Hillingdon SPD May 2013.

The applicant is required to annotate all dimensions of parking bays, aisle width, pedestrian visibility plays, secure and sheltered cycle storage, etc on the deposited plans.

Additional highways comments concerning the original submitted plans/parking layouts:

1. Parking bays too close to access would create obstruction, parking bays should be at least 5m from the access bellmouth.

OFFICER COMMENT: This arrangement has been amended to remove the potential for obstruction)

2. Barriers/gates are not supported off a major road unless set back by 5m into the site.

OFFICER COMMENT: The proposed barriers are set back circa 8 metres from Falling Lane)

3. Bay 31 is inaccessible.

(OFFICER COMMENT: Plan amendments have been secured which ensure all parking bays are accessible)

4. Physical measures required to ensure vehicles do not overhang over pedestrian paths inside car park eg bays 1-4

(OFFICER COMMENT: Amended plans have been provided showing a dedicated walking path applied to the car park surface.)

5. Disable bay no.1 is inaccessible also need 1m aisle length to allow for vehicle to manoeuvre into the bay

(OFFICER COMMENT: Amendments have been secured which ensure all parking bays are accessible)

6. Refuse store/collection point too close to signal junction, refuse store relocated to where the vehicle access is proposed/second refuse store or a waste management plan that ensure refuse bins will be moved to second refuse store point on day of collections.

(OFFICER COMMENT: The applicant has agreed to implement a managed refuse collection on the Falling Lane site, therefore there is now only one refuse collection point which is positioned away from the junction.)

7. All car parking bays to be with EV charging points (active and passive)

(OFFICER COMMENT: This will be secured by condition)

8. Parking bays to be leased

(OFFICER COMMENT: A parking allocation condition is proposed, which will allocate bays to residents only and prohibit lease to 3rd parties.)

9. Cycle parking layout stores appear to be substandard and not easily accessible for all users, physically challenged or with cycle baskets etc there should be a fair mix of types and with detailed information to demonstrate how the layout conforms with local, national or cycle organisations or manufacturers specifications.

(OFFICER COMMENT: Further details will be secured by condition)

10. Footway along Falling Lane narrows at one point - applicant needs to review either build out the footway or set the building back to provide at least 3m minimum unobstructed footway in proximity to

the busy junction.

(OFFICER COMMENT: This will be secured via the S278/Highway works)

11. Usage of existing car park by school - survey - identification - accumulation etc

(OFFICER COMMENT: Full details are set out within the TA and the proposals will secure the retention of 15 parking spaces for the school, secured via the proposed legal agreement)

12. Upgrade of existing zebra crossing along Falling Lane to a pelican/toucan crossing - assessment to be provided

(OFFICER COMMENT: No assessment needed as this scheme is already funded via TfL monies with designs substantially complete)

13. Review of bus stop off High Street - upgrade layout/extension in length/deeper layby/countdown facility/etc

(OFFICER COMMENT: A contribution to relocate the bus stop is proposed and the applicant has agreed to this sum)

Local Highways Improvements/ATZ works: A financial contribution amounting to £125,476 to deliver

Works to improve the Y29 footpath £38,276

Pedestrian access to the Park from Otterfield Road £35,000

Bus Shelter works (High Street) £22,500

Tactile Paving/Dropped Kerbs/Localised Parking restrictions £5,500

Santander Bike Scheme; £17,500

New Seating/Bench installation £6,000

New Bin installations £700

TOTAL: £125,476

## **7. MAIN PLANNING ISSUES**

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

The proposed development proposes the delivery of 100 new homes of which half will be affordable housing, together with a replacement public library following the demolition of the existing library building on Falling Lane. The proposal will also bring a vacant brownfield site back into use on Otterfield Road.

This proposal is considered to be in accordance with paragraph 119 of the NPPF and Policy GG2 of the London Plan, which both require proposals to make the best use of land, it is recognised that the redevelopment of brownfield sites should be prioritised to ensure that proposals limit their harm to the natural environment and to ensure that new developments are located within existing built-up areas, which tend to have better supporting infrastructure. This is supported by paragraph 120 of the NPPF which states that substantial weight should be given to the value of using suitable brownfield land whilst promoting and supporting the development of under-utilised land.

It is also located in the Heathrow Opportunity Area. Opportunity Areas, defined by Policy SD1 of the London Plan (Opportunity Areas), are areas identified with the highest potential for development growth, with capacity to deliver a substantial amount of new homes and jobs. In particular, proposals in Opportunity Areas should seek to maximise the delivery of affordable housing and create mixed and inclusive communities by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, whilst ensuring that development facilitates ambitious transport mode share targets. The supporting text to Policy SD1 of the London Plan outlines that intensification is key to meeting housing targets, particularly for outer London boroughs where the suburban

pattern of development has significant potential for higher density residential development. The application site falls within the Heathrow Opportunity Area, with an indicative capacity of 13,000 new homes and 11,000 new jobs, which itself is part of the wider Heathrow/Elizabeth Line West Growth Corridor.

Paragraph 123 of the NPPF, which requires local planning authorities to take a proactive approach to applications which encourage higher density residential development and which propose alternative uses of developed land, particularly supporting proposals which seek to use employment land for homes, or which make more effective use of a site providing a community use, provided this would not undermine the town centre network or reduce the quality of service provision or access to open space. In this regard, it is recognised that prioritising brownfield sites for redevelopment at higher densities is particularly important for outer London boroughs, as it ensures that housing targets can be met without developing on the Green Belt (or Metropolitan Open Land), which serves as a permanent open buffer between London and the surrounding settlements, preventing urban sprawl.

Policy D1 (London's form, character and capacity for growth) and Policy D3 (Optimising Site capacity through the design led approach) of the London Plan both require proposals to have regard to the context of the surrounding area. Policy D3 further states that all development must make the best use of land and that higher density developments should be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking or cycling.

There is a clear presumption in favour of redeveloping brownfield sites to provide new housing, especially for sites which fall within Opportunity Areas and town centre boundaries, as these areas either have or are expected to have access to higher levels of public transport (in this instance a PTAL of 3). The proposal would contribute to this objective, and notably with the provision of 50% affordable housing (to be provided as 50 LAR units), would contribute to the strategic objectives of maximising affordable housing contributions from sites with the highest growth potential in accordance with Policy GG4 of the London Plan. At present, the Falling Lane site is largely occupied by outdoor surface parking, and a two-storey building, and it is considered that this fails to optimise the site's potential having regard to Policies SD1, D1 and D3 of the London Plan, whilst the Otterfield Road site is vacant and inaccessible, and therefore provides little to no public benefit, and does not contribute to the vitality of the town centre.

Moreover, Policy GG4 (Delivering the homes Londoners need) sets out 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, must support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable and must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

Policy H1 of the London Plan (Increasing housing supply) sets the 10-year housing targets for each London borough, and this places a 10-year housing completions target for the London Borough of Hillingdon of 10, 830 homes (starting in 2019/20 and continuing through to 2028/29). Boroughs are required to optimise the potential for housing delivery on all suitable and available brownfield sites, especially for sites with existing or planned public transport access levels (PTALs) 3-6, which are located within 800m of a station or town centre boundary, or are on industrial sites that have been identified through the processes set out in Policies E4, E5 and E7 of the London Plan as being suitable for redevelopment.

The redevelopment of these sites will support the delivery of 50 new affordable homes and 50 new markets homes in accordance with policies and contribute to achieving the borough's housing targets in accordance with London Plan policies GG4 and H1.

Policy SD6 of the London Plan (Town centres and high streets) seeks to promote and enhance the vitality and viability of London's town centre network by encouraging a range of uses within town centres including (alongside main town centre uses) civic, community, social and residential uses. Of particular relevance, Policy SD6 states that the potential for new housing within and on the edge of town centres should be realised through mixed-use or purely residential developments where these make the best use of land, capitalising on the availability of services within walking and cycling distance, whilst the provision of social infrastructure should be enhanced. The supporting text to this policy confirms that residential development can play an important role in ensuring town centre vitality, and residential-only schemes in town centres may be appropriate outside the primary shopping area, and primary and secondary shopping frontages, where it can be demonstrated that they would not undermine local character or the diverse range of uses required to make a town centre vibrant and viable.

Policy SD7 of the London Plan (Town centres: development principles and Development Plan Documents) further highlights that some sites within town centres may be suitable for higher density mixed-use or residential intensification, such as through the comprehensive redevelopment of surface car-parks, surplus shopping frontages or other low-density town centre buildings that are not of heritage value, whilst re-providing any non-residential uses that would be lost as part of the redevelopment.

Policy CI1 of the Hillingdon Local Plan: Strategic Policies (Community Infrastructure Provision) sets out that community and social infrastructure which caters for the needs of the existing community and future populations should be encouraged, which includes supporting the retention and enhancement of existing community facilities whilst resisting their loss. Where the loss of community facilities is justified, the council will seek to ensure that the resulting development compensates these uses to ensure there is no net loss. In some instances, developments may need to contribute towards the provision of community facilities.

Policy CI1 further sets out that community facilities (including health facilities, police stations, leisure facilities, community centres and libraries) should be sited in town centres or other accessible locations to maximise community access, make best use of sustainable transport options and build a sense of local identity. Moreover, community facilities and services must be accessible and inclusive to all potential users regardless of age, ability, gender or socio-economic status.

Policy DMTC 1 of the Hillingdon Local Plan: Development Management Policies (Town Centre Developments), supports the principles of the London Plan town centre hierarchy and states that the use of ground floors for residential purposes within primary and secondary shopping areas will not be supported and interruptions in the shopping frontage should be minimised to ensure the frontages are kept as an area of continuous commercial activity.

Whilst both parcels of land fall within the district centre boundary, neither are designated as part of the primary or secondary shopping areas, and as such, the loss of the non-residential frontage onto the High Street (as a result of the loss of the library) would have a minimal impact on the continued vitality of the town centre. Moreover, it is noted that the

existing library is sited at the northern end of the High Street, where the shopping frontage is less continuous as a result of the George and Dragon pub (adjacent), the former Methodist Church the large Aldi store (opposite), whilst the overall design of the existing library building does not currently provide a high level of interest or particularly promote activity.

It is further recognised that the proposal would result in the loss of the existing library (276 sqm) (F1 (d) use class) and the fitness centre above (276 sqm) (E(d) use class), with a replacement library facility (312 sqm) to be re-provided within the ground floor of the Otterfield Road site. The proposed location of the new library remains within the same district centre, with a slightly larger floorspace, and it is therefore considered that the relocation of the existing library is acceptable and would not lead to a reduction or shortfall in the amount of community floorspace, in accordance with the requirements for redevelopment proposals as set out in Policies SD6 and SD7 of the London Plan and the community infrastructure requirements of Policy CI1 of the Hillingdon Local Plan. The proposed loss of the town centre uses at first floor level within the library building (in use as a fitness centre) would not be re-provided as part of the proposal, and it is recognised that this results in the loss of some town centre uses, however in light of local vacancies in the district centre as whole, it is considered very unlikely that the loss of 276 sqm of non-residential floorspace, outside of the primary or secondary shopping areas, would result in significant harm to the vitality or viability of Yiewsley and West Drayton District Centre.

In summary, recognising that both sites are underutilised accessible town centre locations, it is considered that the principle of residential-led redevelopment (which re-provides the library) is acceptable in principle, in accordance with the general thrust of the NPPF, the London Plan and Hillingdon Local Plan, which require local planning authorities to promote residential developments in suitable town centre locations and make the most efficient use of previously developed land. The application site's inclusion within the Heathrow Opportunity Area, which are areas identified as having the highest potential for growth in the London Plan, reinforces the strategic need for housing in this location, and the provision of 50 LAR units would make a significant contribution to the borough's affordable housing targets and help to address the strategic target of 50% of all new housing in London to be affordable.

It should be further noted that the Otterfield Road site gained planning permission for a mixed-use development up to three-storeys in height, comprising 12 supported housing/living flats, a health centre and gym on the 6th June 2014 (Ref: 18344/APP/2013/3564). Whilst this permission has now lapsed, it is a material consideration, and supports the principle of a residential-led, mixed-use development on the Otterfield Road site. The previous permission was approved under a different planning regime, and there have been several policy changes since permission was granted including the introduction of a new NPPF (2019 and 2021), London Plan (2015 and 2021) and Hillingdon Local Plan Part 2: Development Management Policies (2020), however in general, the changes in policy have reflected a need to build housing at greater densities, prioritising town centre locations and encouraging more sustainable travel. This is evident in the Hillingdon Local Plan annual housing completion targets of 425 set out in Policy H1 of the Hillingdon Local Plan (adopted in 2012) compared to the completion target of 1,083 new homes each year set out in Policy H1 of the London Plan (adopted 2021).

Overall, as discussed above, it is considered that the proposed redevelopment of the two parcels of land on either side of Yiewsley Recreation Ground is acceptable in principle, and would accord with the principles of sustainable development as set out in the NPPF,

London Plan and Hillingdon Local Plan, in particular seeking to prioritise the development of brownfield sites which have been identified through the plan-led process as suitable for growth, such as Opportunity Areas and Town Centres, for residential-led mixed use developments. Moreover, the proposal would make a meaningful contribution to the borough's annual housing targets (approximately 10% of the annual target), with a significant proportion of affordable housing specifically targeted at addressing the council's housing waiting list through the provision of low-cost rented tenures only (to be secured as no higher than LAR levels which are reviewed annually).

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

The supporting text to Policy GG2 of the London Plan outlines that London is anticipated to experience very high levels of continued growth which will require more efficient use of land, to allow growth whilst protecting the Green Belt. As such, to get more out of limited land availability within the city, encouraging higher densities and a mix of uses in appropriate locations is required to facilitate growth whilst protecting the Green Belt. Encouraging higher densities in appropriate locations means more people are within walking distance of local amenities and transport connections, which in turn reduces the need for private car ownership and supports the transition to a more sustainable city.

Policy D3 of the London Plan (Optimising site capacity through the design-led approach) requires all developments to make the best use of land, by optimising a site's capacity. Optimising does not mean maximising, and a proposal should seek respond to a site's context whilst also recognising its capacity for growth. The supporting text to Policy D3 recognises that direct comparisons between schemes using a single measure (e.g. units per hectare) can be misleading because it depends on the area included in the application site boundary and does not take into account the size of residential units or a mix of uses within one building. Nonetheless, the proposed density of a development is a relevant consideration and provides a broad picture of a scheme's suitability for a site, but it is important to measure in a number of ways.

In this instance, neither site currently includes any residential uses, and the proposal would introduce 100 dwellings, which can also be measured as 279 habitable rooms, 179 bedrooms, or 292 occupants. The overall site area is 0.665 hectares (ha), and as such, the proposal would have a density of 150 units/ha, 420 habitable rooms/ha, 269 bedrooms/ha or 439 occupants/ha.

In accordance with Policy DMHB 17 of the Hillingdon Local Plan: Development Management Policies (Residential Density), all new development should take account of the residential matrix presented in table 5.2, which sets out that an appropriate starting point for assessing appropriate densities within Yiewsley town centre is between 150-250 units/ha, or 450-750 habitable rooms/ha, for proposed flatted developments. The proposed density falls at the lower end of both of these ranges, as the proposal has to respond to the undeveloped and generally low-rise context of its surroundings, and is considered to represent an optimal use of the site which provides a good level of new housing, appropriate for the density of residential development the area, when taking into account all other material considerations.

### **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 housing mix is proposed as 42 one-bedroom flats (18 at Falling Lane; 24 at Otterfield Road), 37 two-bedroom flats (24 at Falling Lane; 13 at Otterfield Road) and 21 three-bedroom flats (8 at Falling Lane; 13 at Otterfield Road). The scheme proposes the mix as 42% one-bedroom flats, 37% two-bedroom flats and 21% three-bedroom flats by unit.

This overall housing mix is considered to be acceptable, and noting the comments from the council's housing officer, the proposed mix would broadly meet local demand and would therefore comply with Policy H10 of the London Plan.

### **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**

Policy HC1 of the London Plan (Heritage conservation and growth) states that

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

Policy HE1 of the Hillingdon Local Plan: Strategic Policies (Heritage) states that the council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments, Registered Parks and Gardens and historic landscapes, Archaeological Priority Zones and Areas. Non-designated heritage assets (recognised at a local level) such as Areas of Special Local Character and Locally Listed Buildings will also be protected and harm to their significance will be resisted.

The application site does not fall within a Conservation Area, and would not affect a nationally listed building or its setting, however there are a number of locally listed buildings nearby including the George and Dragon pub adjacent to the Falling Lane site (176 High Street), the former Methodist Church (152-156 High Street), the former Town Hall and St Mathew's Church (both sited at the junction of the High Street with Fairfield Road).

These non-designated heritage assets are generally important as local landmark or wayfinding buildings, often in key or prominent locations along the main High Street. The prominence and simple architectural styles of these buildings contribute to their inclusion as buildings of historical value.

As demonstrated in the views analysis submitted in support of the application (Drawing No. M9534-HUN-DR-APL215 - Rev. A), and the proposed streetscene elevations of the High Street (Drawing No. M9534-HUN-A-APL117 - Rev. C) it is considered that the proposal would not have a significant impact on the significance of the George and Dragon pub or its setting, with the key architectural features and its spacious setting unaffected by the proposals. The remaining locally listed buildings nearby would be sited a sufficient distance away from both sites that they would not be readily visible in the same vista and therefore would be largely unaffected.

#### **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.

In this instance, it is considered that the proposal would not lead to harm. This is confirmed in the response from the National Air Traffic Services who have stated that they have "no safeguarding objection to the proposal".

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

As noted earlier within the report, both sites are located on the edge of Yiewsley Recreation Ground, the majority of which is designated as Metropolitan Open Land (MOL). Policy G3 of the London Plan (Metropolitan Open land) states that Metropolitan Open land (MOL) is afforded the same status and level of protection as Green Belt, and should be protected from inappropriate development in accordance with national planning policy tests that apply

to the Green Belt.

Chapter 13 of the NPPF outlines the importance of protecting the Green Belt, and its fundamental aim is to prevent urban sprawl by keeping land permanently open. As such, the two essential characteristics of the Green Belt are its openness and its permanence. Paragraph 138 of the NPPF outlines that the Green Belt serves five purposes, and these are to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. In addition, paragraph 145 of the NPPF sets out that within Green Belts, local planning authorities should proactively look for opportunities to provide public access, together with improved opportunities for outdoor sport and recreation.

The NPPF further outlines that any inappropriate development within the Green Belt will be, by definition, harmful to its key characteristics, and proposals which affect the openness of the Green Belt should be refused unless overriding material considerations outweigh this harm.

Policy EM2 of the Hillingdon Local Plan: Strategic Policies (Green Belt, Metropolitan Open Land and Green Chains) states that the Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, MOL and Green Chains, whilst Policy DMEI 6 of the Hillingdon Local Plan: Development Management Policies (Development in Green Edge Locations) sets out that new development adjacent to MOL should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

There is not a definition of openness but it is generally agreed that the main component of open land is its undeveloped nature, generally free of buildings or structures, and noting that the application site falls fully outside of the MOL boundary, the proposed openness of the MOL (i.e. the amount of built form within the MOL) would be unaffected by the proposal.

It is recognised that there would be some impact on visual amenity from within the MOL, as the proposal would increase the amount of built form adjacent to the MOL, however in the context of a park which is sited in the centre of a built-up area, this is considered to have a minimal effect on the key characteristics of the MOL, which is already appreciated in an urban environment. Moreover, the proposal would not encroach onto the boundaries of the MOL, and has been designed to maximise landscaped areas near to the boundaries with the park, to minimise any impacts of the proposal. In this regard, amendments to the layout of the proposed Falling Lane building have resulted in a larger amount of the ground floor to be given over to soft landscaped areas within the Falling lane site which better supports the transition from undeveloped land to developed land on the High Street.

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

Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. 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, including existing and planned supporting infrastructure capacity. 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, in accordance with Policy D2 of the London Plan. In areas of comparatively low densities,

incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way.

As such, proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through layout, orientation, scale, appearance, and shape regarding building types, forms, proportions, and the street hierarchy. Proposals should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings that are aligned with peoples' movement patterns and desire lines in the area, be street-based with clearly defined public and private environments, and facilitate efficient servicing and maintenance of buildings and the public realm that minimise negative impacts on the environment, public realm and vulnerable road users.

Policy D9 of the London Plan (Tall buildings) sets out that the definition of a tall building is defined at a local level, depending on the characteristics of the surrounding area, but in any case, should not include developments of less than six storeys or 18 metres above ground level. Where a tall building is proposed, the proposal's visual, functional and environmental impacts should be carefully considered, including the cumulative effects with other existing, planned or consented developments in the vicinity. The supporting text to Policy D9 indicates that the higher the building, the greater the level of scrutiny required of its design because of the more significant potential impacts.

Policy D9 further states that whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and broader context and aid legibility and wayfinding. 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. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces, there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and clear public benefits outweigh that harm. The purpose of Policy D9 is to ensure that tall buildings are located in appropriate locations where higher densities can be supported and where proposals are less likely to have significant visual, functional or environmental impacts, with areas appropriate for tall buildings identified within the development plan. Policy D9 is clear that the level of assessment should be proportionate to the proposal's scale, and the taller the building, the more rigorous assessment required.

Policy D9 should further be considered in the context of Policy DMHB 10 of the Hillingdon Local Plan: Development Management Policies (High Buildings and Structures), which states that any proposal for a tall building must respond to its local context and notes that tall buildings can be used to create or emphasise a point of civic or visual significance. Tall buildings within the borough should generally be located within Uxbridge or Hayes Town Centres, and outside these two centres, tall buildings are generally inappropriate. Policy DMHB 10 further states that tall buildings should be located in areas of higher public transport accessibility and be proportionate in terms of their overall height, form, massing and footprint, with particular consideration given to their integration with the local street network, nearby public spaces and their impact on local views.

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) sets out that to create successful and sustainable neighbourhoods, new development (including new

buildings, alterations and extensions) should be of a high-quality design that enhances the local distinctiveness of the area and contributes to a sense of place. As such. Proposals should be designed to be appropriate to the context of Hillingdon's buildings, townscapes, landscapes and views and make a positive contribution to the local area in terms of layout, form, scale and materials. In addition, proposals should not result in the inappropriate development of gardens and green spaces as this could lead to the erosion of the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas. Proposals within Yiewsley should specifically seek to improve their visual environment.

Policy BE1 further sets out that tall buildings should not adversely affect their surroundings, cause harm to the significance of heritage assets or impact important views. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape. Further, when considering design options, regard should be had to Policy GG2 and SD1 of the London Plan, which requires proposals to make the most effective use of land to help boroughs achieve their annual housing targets, which often requires more intensive development in sustainable locations, such as town centres and opportunity areas.

As set out above, the proposal comprises two parcels of land on either side of Yiewsley Recreation Ground; the Falling Lane site currently occupied by a library and car park and the cleared Otterfield Road site (with the former swimming pool demolished in 2011).

## FALLING LANE

The proposed development of the Falling Lane site seeks permission for a part two, three, four and five-storey residential building which steps up in height from east to west. The proposed building would have a maximum height of 16.7 metres (17.5 to the top of the rooftop balustrade).

The loss of the existing library building has been determined as acceptable on design grounds, recognising that this building makes a broadly neutral contribution to the appearance of the street scene with a somewhat dated design and a slightly top-heavy appearance of no architectural value. However, as the proposed building occupies a prominent corner location where Falling lane meets the High Street, any proposal for a new building on this plot must be of a high-quality design. The context of the Falling lane site is of a mixed character with a variety of non-residential uses in the vicinity (mainly to the east, south and west) with lower-rise residential buildings to the north along Falling Lane.

The proposed development of the Falling lane site would see the introduction of a five-storey building onto a plot with an existing two-storey building and would substantially increase the built footprint within the site, noting that most of the site is used for external surface-level parking. However, the building would have a varied height across the site, which is considered to respond well to the site's disparate contexts to the north and south and supports a transition in scale from an undeveloped park to a busy town centre high street. This approach also helps to break down the mass of the development, adding visual interest through the provision of a series of terraces of different heights, which, when coupled with the setback of the top storey, also helps to break up the perceived scale of the building, helping to create a more varied visual profile.

In particular, the proposed building steps up appropriately from the adjacent locally listed George and Dragon pub whilst maintaining good separation distances between the

proposed and existing buildings. Hence, as not to overly disrupt the development pattern, the variation in height contributes to a legible transition in scale that would be visible at street level. It is further recognised that the massing of the northern part of the building has been set away from Falling Lane to maximise views from Falling Lane into the park and reduce the overall visual impact of this proposed building.

Moreover, the proposed layout will optimise the use of the site, allowing space for parking for future residents and users of Rabbsfarm Primary School, whilst encouraging active ground floor residential frontages with front doors facing directly onto the street. The proposed visible front doors would reinforce the residential appearance of the building and would be consistent with the general appearance of residential buildings nearby, where individual private entrances to houses are the norm. The proposed communal courtyard provides a good quality of amenity space for future residents and helps soften the edges of the scheme as supported by Policy DMEI 6 of the Hillingdon Local Plan. The layout minimises the amount of hardstanding and space dedicated for vehicles within the site. It improves the street scene and visual appearance of the development facing Falling Lane, as the frontage includes landscaping behind which is set behind the building line and proposed parking is predominantly within the proposed undercroft.

As noted above, the proposed Falling Lane building addresses the street well whilst creating usable enclosed amenity spaces. The introduction of private entrances and communal doors at the ground floor level would provide an active residential frontage and avoid the creation of blank elevations. The main communal entrance is well-positioned at the corner of the junction, set back slightly from the edge of the footway to allow a small area of external refuge. The private residential entrances on Falling Lane would serve first floor flats, with stairs and a foyer providing occupiers of these flats direct access to the street. The units facing the High Street benefit from a larger footway immediately to the front of their entrances and serve duplex units, and these entrances further contribute to a sense of activity on the high street, providing a continuous frontage as the building wraps around the corner of the High Street into Falling Lane. The bus stop to the front of the library on the High Street would need to be relocated, and this would be secured within the legal agreement.

Together with the doors at ground floor level, it is considered that the proposed detailed design is of good quality and offers a coherent frontage at all levels facing onto the public highway with brickwork features and fenestration, which give the proposed building a human scale and demonstrate the residential architectural quality of the scheme. In addition, the articulation of the facades incorporates a mix of in-set and traditional balconies, providing private amenity space and visual depth to the facade, which complements the up-and-down massing of the building.

Using brick as an external material is acceptable as it would be robust and durable and should help the building, subject to colour, tone and texture, sit contextually within its surroundings. In addition to the primary facing material of brick, metal cladding is to be used to break up the mass further with perforated metal panel balustrades and tall glazing providing a more modern contemporary aesthetic. This juxtaposition of modern materials with brick would create an attractive frontage.

## OTTERFIELD ROAD

The proposed Otterfield Road building would also have a varied height, appearing as a part three, four, five and six-storey structure with a maximum height of 18 metres (19.3 metres

including the rooftop parapet and railings). The proposed massing seeks to have the tallest elements towards the south of the site at six-storeys, whilst the middle of the site would be three-storeys, and the north of the site would be five-storeys, resulting in an up-and-down stepped appearance, similar to the design rationale proposed at the Falling Lane site.

The Otterfield Road site has a similar character to the Falling Lane site, with the undeveloped park defining one boundary and a mix of residential and non-residential uses nearby of varying scale. However, it is recognised that the residential homes to the north and east outside of the town centre boundary are almost exclusively two-storeys in height. The triangular-shaped plot is enclosed to the east by the rear gardens of the residential properties along Otterfield Road, Fairfield Road Public Car Park to the south and the Yiewsley Recreation Ground to the west.

Noting that parts of the proposed building on Otterfield Road will be six storeys, the minimum threshold for a tall building set out in London Plan Policy D9 of the London Plan has been met. However, meeting this threshold is insufficient to determine whether a building meets the development plan definition of a tall building. The supporting text to Local Plan policy DMHB10 (para 5.32) states that tall buildings are those structures that are substantially taller than their surroundings, causing a significant change to the skyline. During the application's assessment, the height of the Otterfield Road building has been reduced by three metres, but this has not affected the number of storeys.

As a result of the undeveloped nature of the adjacent park and the low-rise two-storey houses, the development on Otterfield Road would appear taller than its immediate context and would substantially change the skyline, making it a tall building. This part of the development has been assessed against Policy D9 of the London Plan and Policy DMHB 10 of the Hillingdon Local Plan 2020. However, as only a small section on the building is above the threshold in policy D9, the assessment of the visual, function and environmental impacts is proportionate.

The development plan does not support the principle of a tall building in this location, outside of Uxbridge and Hayes town centre. Consequently, there is a conflict with the locational requirements of policies D9 and DMHB10. However, the Courts have recently clarified that it is still necessary and appropriate to consider the impacts of the proposals as set out in the remainder of the policies to determine the extent of the policy conflict and the weight to be given in the overall planning balance.

The views analysis submitted in support of the application illustratively shows the completed building in its context, appearing readily visible and affecting the skyline of Yiewsley when looking at the site from the west and north, across the unobstructed vista of Yiewsley Recreation Ground. This is evident in view 02 (from Gordon Road looking south-east), view 03 (from the western side of the park looking south-east) and view 05 (from the top of the park looking south), where the proposed building is visible in the skyline, exceeding the height of the tree line which runs along the eastern boundary of the park and partially filling in part of the unobstructed skyline. In this regard, the analysis of the views demonstrates there would be limited harm to visual amenity associated with the development of the Otterfield Road site.

Whilst some limited harm has been identified, the existing plot formerly housed an indoor swimming pool which would have been visible to some extent from the park before its demolition, and it is recognised that any form of redevelopment of the Otterfield Road site would result in some harm to views from within the park, partially filling in a gap in the

treeline. It is of further relevance that the existing park sits in the middle of a built-up area, and whilst existing buildings around the park tend to be of a lower scale than the current proposal, some level of development on this site would be expected. Due to changes in land levels, the proposed Otterfield Road building would also be approximately 0.5 metres below the park level, which would help limit the perceived scale of the building when looking from the west.

The views analysis further assesses the impact of the proposed Otterfield Road building on views not within the park to determine the level of harm, if any, of the proposal on medium/long-distance views. At medium range, the proposal would have little to no impact on the skyline outside of Yiewsley Recreation ground because of the tight-knit development pattern to the south and east of the proposal. This minimal impact is demonstrated by view 01 (to the front of the George and Dragon pub looking east) and view 04 (from the north of Otterfield Road looking south), which are representative of the impacts to the High Street and the residential area to the north-east respectively, with the proposal not readily visible in either view.

Overall, the analysis of the views submitted in support of the application satisfactorily demonstrate that the visual impact of the proposed development would be acceptable, with a moderate impact on local visual amenity within the park as a result of its open and undeveloped nature, but with little to no impact on medium or long-distance views within the Yiewsley or West Drayton Area.

Looking at the environmental impacts, the first to consider is the microclimate. Whilst the proposed Otterfield Road building is deemed tall, most of the proposed building is below this height. Consequently, the impacts on local wind conditions and microclimate would be minimal, especially noting that there is no cumulative impact of groupings of tall buildings to consider. In this regard, the proposal would maintain suitable comfort levels (using Lawson's comfort criteria) around the edges of the proposed structures and within the park.

As with the proposed development at Falling Lane, the proposed building would have a varied height across the length of the plot, with an up-and-down approach to the size from south to north with the massing broken down into series of terraces at different heights. The scale and massing have sought to respond to the constraints of the site (namely the two-storey houses on Otterfield Road and the undeveloped parkland to the west), and the variation in height across the site is supported to ensure the proposal does not appear monolithic or oppressive, with an undulating form which allows the various elements to be expressed and appreciated separately.

The proposed roof form of this building further complements the design rationale, with a mix of flat and pitched roof forms that help break the proposal's massing down into smaller elements. This approach also helps reduce the perceived scale of the development from the street, recreational area and the neighbouring gardens. It also gives the building a distinctive silhouette, adding variation to the skyline responding to the specific design requirements of Policy D9 and DMHB 10 of the London Plan and Hillingdon Local Plan.

As with the proposed Falling Lane site, the ground floor of the proposed building would serve several functions and, in this instance, would also re-provide the library previously located on the Falling Lane site. The proposed replacement library would be at ground floor level, with direct access from the street, and would have a slightly larger floor space of 312 sqm (compared to 276 sqm as existing), ensuring a comparable quantity and quality of



community space provision. The library's location is logical, being in the most prominent part of the building and facing out onto the public car park, whilst being visible to some extent from Yiewsley Recreation Ground. It would create an active frontage and provide a base to the building, as advised by Policy D9 of the London Plan, and the civic presence of this part of the building is emphasised through its detailed design, the use of different materials, the addition of timber elements that frame the entrance and increased levels of glazing.

Overall the proposed layout is considered a suitable design response to the constraints of the irregularly-shaped plot of land with the proposed building stepped back on both the southwest and north corners to help reduce the impact on the two-storey residential properties along Otterfield Road. Moreover, the proposed position of the building broadly in the middle of the plot allows sufficient room for landscaped buffering, and consequently, this provides for front gardens on both boundaries, which maximises the separation distance to the existing properties on Otterfield Road.

The suggested materials are considered acceptable in principle and should complement the local built environment. The use of red, cream and grey bricks will help to visually break up the mass of the building and add visual interest whilst maintaining a common language throughout the development. The suggested textures and tones of the brick within the Design and Access Statement would be encouraged, and a condition would secure this. Moreover, the proposed facade, which comprises a brick grid punctuated by recessed brick panels, which would sit next to windows and sliding shutters, would add significant visual interest and articulation to the facade, which would be further enhanced with balconies to animate the elevations and create a sense of visual rhythm.

This assessment of the impacts of the proposed tall building has shown that the proposal meets the impact requirements of policies D9 and DMHB10, whilst not meeting the locational requirements.

Overall there is a partial policy conflict therefore with tall buildings policy. Nonetheless it is important to make a proper planning consideration of the proposal; not only does the proposal satisfy the impact tests, but as described in the density section of the report the Otterfield road building is at the lower end of the density range (which is unusual for a building which falls to be considered under tall building policy). In fact the 150 u/ha is at the very bottom of the 150-250u/ha density range that applies to the sites location. To the effect that the removal of any units could in itself cause a conflict with density and site optimisation development plan policies. As such officers saw no merit in requiring the building to be altered to remove the sixth storey (which only includes 3 flats); not least as there would be limited appreciable benefit of doing this given the way the building is designed. The majority of the massing of the building is below 6 storeys and the changing building heights are a key part of the design of the building, they are what prevents it appearing at all monolithic in scale or form and result in a building whose design is superior to that of a lot of modern flatted developments. Furthermore the partial policy conflict must be considered in the planning balance, as set out in other parts of this report the development involves a number of significant benefits.

#### **7.08 Impact on neighbours**

Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies and Policy BE1 of the Hillingdon Local Plan: Strategic Policies both seek to ensure that new development does not adversely impact on the residential amenity of neighbouring properties. The supporting text to Policy DMHB 11 sets out that sufficient privacy for existing residents will be protected by resisting proposals which would introduce an unreasonable level of overlooking between habitable rooms of adjacent residential

properties, schools or onto private open spaces. To maintain existing levels of privacy, a minimum separation distance of 21 metres between facing habitable room windows of habitable rooms will be required, and in some locations, for example where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary. Moreover, new development proposals must carefully consider their layout and massing in order to ensure development does not result in a significantly increased sense of enclosure or loss of outlook.

## DAYLIGHT/SUNLIGHT

Furthermore, the Mayor's Housing SPG sets out that proposals should limit the harm to neighbouring properties, whilst recognising that to comply with policies seeking the optimal use of land, some development proposals may be allowed even where harm has been identified. When assessing impacts related to the loss of natural light, the Mayor's Housing SPG advises that avoiding harm to habitable rooms is the priority, which are usually defined as any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bathrooms or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition of habitable rooms.

A standardised method of assessment for calculating the level of impact to neighbouring buildings is prescribed within the BRE's guide to good practice, titled 'Site Layout Planning for Daylight and Sunlight'. This guidance document discusses various methods of assessing a proposals impact on access to natural light, and sets out a number of thresholds which, if exceeded, would probably have a noticeable impact on natural light to neighbouring properties. The BRE guidance sets out that a loss of light to existing windows does not need to be assessed if the distance of each part of the new development from the existing window is at least three times the height of the centre of the existing window, as the loss of natural light will be very small in these instances. Typically, the centre of ground floor windows tend to be about 1.5 metres above the ground and some windows (for example bay windows are designed in a concave shape to maximise the amount of daylight that reaches the glass).

Where an assessment of access to natural light is considered necessary, BRE guidance sets out a number of tests which can be carried out to determine the level of harm, if any has been identified. The first test involves drawing a horizontal line from the midpoint of the affected window, followed by a second line which extends upwards at an angle of 25 degrees from the centre of the window. If the second line (extending away from the window at an angle of 25 degrees) intersects the line of the proposed building, then the proposal might have an adverse impact on light, and further assessments are required.

Broadly, these further assessments consider the likely significant effects to daylight for neighbouring buildings in terms of Vertical Sky Component (VSC), Daylight Distribution (DD) (often referred to as No-Sky Line) and Average Daylight Factor (ADF). An assessment of sunlight can also undertaken in relation to neighbouring buildings in terms of Average Probable Sunlight Hours (APSH), where windows are within 90 degrees of due south, or through an assessment of overshadowing.

An overshadowing assessment should shadow on the ground at different times of the day on March 21st, June 21st and December 21st, and BRE guidance further recommends that where a large building is proposed, which may affect a number of gardens or open spaces, a shadow plan showing the location of shadows at different times of the day and

year is produced.

#### Falling Lane

The nearest residential properties to the proposed Falling Lane building are Nos. 17, 19, 21 and 23 Falling Lane, which are sited approximately 32 metres, 39 metres, 44 metres and 45 metres north of the proposal respectively. In line with BRE guidance, Nos. 17 and 19 (at 32 and 39 metres from the application site) are potentially affected by the fourth-storey element of the proposed development, therefore it is considered that a further assessment on the impact to Nos. 17 and 19 is required.

As such, in support of the application, Drawing No. M9534-HUN-A-APL301 (Rev. A) has been submitted which assesses the potential impact to No. 17 and 19 Falling Lane in terms of a loss of daylight. This sectional drawing seeks to demonstrate how the 25 - degree test has been applied to this development, and clearly shows that the closest parts of the proposal (the third and fourth storeys) would not breach the theoretical 25 -degree line. It is noted that the very top of the balustrade on the roof appears to slightly intersect this line, however it is further noted that the line originates from the ground level, rather than the midpoint of the front window, and if the line extended from the midpoint of the window there would be no breach. On this basis, it is considered that the proposal would not have a significant impact on access to natural light to nearby residential properties.

#### Otterfield Road

The relevant residential properties close to the Otterfield Road site are Nos. 37-63 Otterfield Road (odds), many of whom have long rear gardens which back onto the application site. The rear elevations of these properties are located between 41 and 51 metres to the east of the proposed building, and noting that the height of the closest part of the proposed building to the rear of these houses is three to four storeys, it is considered that further assessment is not strictly necessary in accordance with BRE guidance (which states that windows more than 40.5 metres from the proposal need not be assessed).

Nonetheless, Drawing No. M9534-HUN-DR-APL300 (Rev. A), showing the potential daylight impacts of the proposed Otterfield Road building using the 25-degree line test, has been submitted in support of the application, which clearly demonstrates that all nearby residential properties on Otterfield Road would pass this test. Consequently, the proposal has satisfactorily demonstrated that it would not have a significant impact on access to natural light for nearby residential properties.

#### Overshadowing

The Design and Access Statement further makes an assessment of overshadowing, which shows that there would be some level of overshadowing into both the gardens of properties on Otterfield Road and the eastern edge of the park, however this would not be materially harmful and would be commensurate with the level expected of the development of a brownfield site in a town centre location.

#### Overlooking/Privacy/Outlook

As discussed above, the proposal would have some limited impact on visual amenity in the area and would influence the appearance of the skyline at a local level, however it is considered that neither building would significantly affect the outlook of nearby residential properties, and would not lead to a sense of enclosure because of the significant separation distances between facing walls, of at least 40 metres.

The rear of Otterfield Road habitable rooms to the proposed development is at least 40

metres, which far exceed the minimum separation distances of 21 metres described in the Hillingdon Local Plan, it is considered that the proposal would not lead to a loss of privacy. Whilst there would be some increase in the potential for overlooking into the residential gardens of Otterfield Road, it is recognised that there is already a degree of mutual overlooking into neighbouring gardens from first floor windows of existing houses as a result of the traditional parallel layout of the street, which allows obtuse viewing angles into neighbouring properties. As such, noting that the layout of the Otterfield Road building has been designed to minimise overlooking in any event, it is considered that the proposal would not lead to a significant loss of privacy.

Overall, the proposal is considered to comply with the objectives of Policies DMHB 11 and BE 1 of the Hillingdon Local Plan and the Mayor's Housing SPG, insofar as they seek to protect residential amenity, and is acceptable on this basis.

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

Policy D3 of the London Plan states that proposals should deliver appropriate outlook, privacy and amenity, provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity, help prevent or mitigate the impacts of noise and poor air quality, and achieve indoor and outdoor environments that are comfortable and inviting for people to use.

Policy D6 of the London Plan (Housing quality and standards) requires all new residential properties to meet the minimum space standards and further states that the minimum floor to ceiling height must be 2.5m for at least 75 % of the Gross Internal Area of each dwelling to avoid overheating and generally improve living conditions. In addition, the design of new residential development should be high-quality and should provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

Moreover, proposals should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution as a result of site constraints which would mean dual aspect dwellings would severely restrict optimising the site's potential. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

Furthermore, Policy D6 of the London Plan and Standard 26 of the Mayor's London Housing SPG sets out that a minimum of 5 sqm of private outdoor open space should be provided for 1-2 person dwellings, with an additional 1 sqm provided for each additional occupant, and it must achieve a minimum width and depth of 1.5 metres to be functional and fit for purpose. As such, a 3-person dwelling should include 6 sqm of external private amenity space, a 4-person dwelling should include 7 sqm, a 5-person dwelling should include 8 sqm and so on.

Policy S4 of the London Plan (Play and informal recreation), sets out that proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation and enable children and young people to be independently mobile. For residential developments, this means incorporating good-quality, accessible play provision for all ages, with at least 10 sqm of play space provided per child, based on the GLA's child yield calculator. Play space should be accessed safely and independently, be overlooked, not be segregated by tenure, incorporate accessible routes for children and young people, incorporate greenery and should generally provide a

stimulating environment. The supporting text to Policy S4 sets out that there should be appropriate provision for different age groups, including older children and teenagers and that play space provision should usually be provided on-site.

Policy DMCI 5 of the Hillingdon Local Plan: Development Management Policies (Children's Play Areas) requires all major development proposals to provide at least 10 sqm of play space for each child, based on the GLA's child yield calculator, and playgrounds must be within 400m of a development in line with the accessibility standard. In areas of play area deficiency, such as the wards of Pinkwell, Botwell, South Ruislip and West Ruislip, and to a lesser extent, the wards of Cavendish, Manor, Hillingdon East, Yiewsley, Barnhill, Yeading and West Drayton, the provision of new play equipment is a necessity. Policy DMHB 19 of the Hillingdon Local Plan: Development Management Policies (Play Space) further sets out that major development proposals should seek to provide children's play facilities on-site, and where this is not possible, the council will seek a financial contribution towards the improvement of existing children's facilities in the local area.

Policy G4 of the London Plan (Open space) sets out that proposals should not result in the loss of protected open space and, where possible, areas of publicly accessible open space should be created. This is supported by Policy DMCI 4 of the Hillingdon Local Plan: Development Management Policies (Open Spaces in New Development) which states that proposals which enlarge or enhance existing open spaces will be supported, especially where these improve areas identified as being open space deficient.

#### PROPOSED ACCOMMODATION; SPACE STANDARDS

All of the proposed flats would meet the minimum space standards set out in Policy D6 of the London Plan and DMHB16 of the Local Plan, with layouts that are fit for purpose and would provide a good level of amenity. Moreover, the proposed floor-to-ceiling heights of all proposed flats would be at least 2.5 metres high for 75% of each dwelling. Some reduction in the floor-to-ceiling heights within the proposed Otterfield Road building were needed to reduce the overall scale of the building by approximately 3 metres, however this reduction in height would not lead to a significant reduction in the quality of accommodation provided as part of the proposal.

#### DAYLIGHT/SUNLIGHT/ASPECT

It is further recognised that the proposed layout of both buildings seeks to maximise the number of dual-aspect dwellings, recognising the intrinsic benefits of units with multiple sources of natural light and more than one outlook. Within the Otterfield Road building, twelve units would be single aspect whilst within the Falling Lane building, twenty-three would be single aspect, which results in 65% of units (or 65 units) having at least two aspects (noting that some units are triple aspect). Overall, this is considered to be a good proportion of dual-aspect units, and it is further noted that several design features including chamfered walls and partially inset balconies help to improve access to natural light, and the private amenity spaces above ground floor level have been positioned to allow enhanced outlooks not possible from within the units. Moreover, there are no single-aspect north-facing units to ensure that all units receive some level of sunlight during part of the day, and generally single-aspect units are limited to the one-bedroom units.

In this regard, it is recognised that an assessment of internal daylight condition has been undertaken to establish the likely access to natural light within each unit. The amount of daylight is measured using an Average Daylight factor (ADF). Average daylight factor is used to measure the adequacy of diffuse daylight within a room, and accounts for factors such as the size of a window in relation to the size of the room, the reflectance of the walls,

and the nature of the glazing and number of windows. BRE guidelines confirm that the acceptable minimum ADF target value depends on the room use, and these are 1% for a bedroom, 1.5% for a living room and 2% for a family kitchen. In cases where one room serves more than one purpose, the minimum ADF target should be for the room type with the highest value. Notwithstanding this, in practice, the principal use of rooms designed as LKDs (living/dining/kitchen rooms) are generally as a living room and accordingly, it is often reasonable to apply a target of 1.5% to such rooms.

An analysis of internal daylight conditions has been shown within the Energy Statement, and further Daylight Analysis was submitted as part of the application process. These analyses demonstrate that there would generally be good access to natural light within the proposed units, approximately 80% of units would meet or exceed the ADF targets set out in BRE guidelines. It is noted, however, that the analysis provided does not include all proposed units, and has used representative sampling, however, the units chosen are considered to reflect light conditions across both sites and on this basis the analysis is considered to be accurate.

It should be noted that some LKDs, specifically within the Falling Lane site, do not meet the 1.5% ADF target, in some instances due to the single-aspect nature of the unit and/or the presence of an overhanging balcony or terrace, however in general, access to natural light across both sites for future occupiers would be acceptable.

#### PRIVATE/COMMUNAL 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 42 no. 1-bed units, 37 no. 2-bed units and 31 no. 3-bed units, the proposed development would require 2,395 square metres of private amenity space.

Each unit within the Falling lane site would be provided with private amenity space, in the form of a an external terrace, or small garden if at ground floor level, and these amenity spaces exceed the minimum space requirements of the Mayor's Housing SPG in terms of both their overall size, depth and width. The total private amenity space proposed for all units is 716sqm. In addition communal gardens within the Falling Lane site are proposed at ground floor level (adjacent to the car park) (169.4 sqm), at third floor level towards the

northern end of the building (41.7 sqm), and at fourth floor level, through the provision of two communal roof terraces at either end of the building (256.4 sqm and 159.6 sqm), totaling an external communal amenity space provision of 627 sqm. The Falling Lane site delivers 1,343sqm of private amenity space on site.

Within the Otterfield Road site, the with private amenity space is comprised of ground floor gardens and upper floor balconies, the total private amenity space proposed for all units is 613sqm. Communal terraces are proposed at third floor level (142.1 sqm and 69 sqm), within the centre and northern parts of the proposed building, and at fourth floor level within the southern part of the building (91.3 sqm), totaling an external communal amenity space provision of 302.4 sqm. In addition the site provide a ground floor area amounting to 157sqm. The Otterfield Road site delivers 1,072sqm of amenity space on site.

The total on site amenity space is therefore 2,415sqm which exceeds the minimum requirements for private amenity space on site.

The amount and quality of the proposed external amenity areas are considered acceptable, and it is considered that these would provide future occupiers with a good level of amenity.

#### CHILD 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 10m<sup>2</sup> 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.

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.

Using the GLA's child yield calculator, in accordance with Policy S4 of the London Plan and Policy DMCI 5 of the Hillingdon Local Plan, the proposed development is expected to house 54.2 children (aged 0-17), which equates to a play space provision requirement of 542 sqm (10 sqm per child). The child yield calculator further identifies that this would include 25.1 children aged 0-4, 18.3 children aged 5-11, 7.1 children aged 12-15 and 3.7 children aged 16-17. As such, 251sqm of door step child play space is required on site or within 100m of the site.

The proposal includes 157 sqm within the Otterfield Road site (at the northern end of the plot) and the Falling Lane site has a large ground floor area which would provide child play space. A condition would be imposed to secure a minimum of 125sqm of child play on each site to ensure adequate door step play was provided on site for future residents in accordance with Policy S4 of the London Plan and Policy DMCI 5 of the Hillingdon Local Plan. The adjoining recreation ground directly adjoins each site and in accordance with policy is able to facilitate the play needs of the 5-15 year olds.

#### PUBLIC OPEN SPACE

It is important to set out clearly that the proposal does not result in the loss of any protected open space, recognising that Yiewsley Recreation Ground is also designated as MOL and therefore any development of this open space would need to be managed through the development plan. Further, in accordance with Policy G4 of the London Plan and Policy DMCI 4 of the Hillingdon Local Plan, which both encourage the enhancement of accessible open spaces, especially in areas of open space deficiency such as the Yiewsley ward, a number of improvements to Yiewsley Recreation Ground are proposed, indicatively shown on Drawing No. APL214 (Rev. B). These improvements are shown as the creation of a new playground near to the centre of the park, and upgrades to the footpaths both through and around the edge of the park including new lighting and fencing.

In addition, the illustrative plan shows improvements to the ramped access from the Fairfield Road car park and the creation of a new entrance to the park adjacent to the library. These improvements would directly benefit both future residents of the development and existing residents, providing play equipment (within the proposed playground) and general improvements to the park environment, including the planting of 30 native trees. The combination of on and off-site provision, and the improvements to the accessibility of the park from the eastern side, are considered to accord with the principles of Policy G4 and DMCI 4, and is considered to be a significant benefit of the scheme, which should be considered as part of the overall planning balance. It should be noted however that the proposed playground (illustratively shown on Drawing No. APL214 - Rev. B) would be expected to be at least 386 sqm, to account for the play space requirements of the London Plan and Hillingdon Local Plan, and this larger provision would be secured through a legal agreement.

In this regard, it is noted that some local resident concerns were raised in respect of loss of access to the park, however at both sites, park accessibility would be maintained or improved. It is further recognised that the existing car parking at Falling Lane can be currently used by people with mobility issues, who use the blue badge spaces to park their



vehicle and access the benefits of Yiewsley Recreation Ground, and that following development, this would not be possible. However, Fairfield Road car park, which would be retained in full, is also adjacent to the Recreation Ground, and blue badge holders can use this car park on visits to the area, with improved ramped access and a new entrance into the park proposed as part of the off-site upgrades to be secured through the legal agreement.

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

Policy T1 of the London Plan (Strategic approach to transport) seeks development proposals to facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Policy T2 of the London Plan (Healthy Streets) requires development proposals to demonstrate how they will reduce the dominance of vehicles on London's streets whether stationary or moving, be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

Policy T4 of the London Plan (Assessing and mitigating transport impacts) sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required, transport assessments or statements should be submitted with proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.

Policy T4 further explains that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.

Developments should provide cycle parking at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Policy T6 of the London Plan (Car Parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free developments have no general parking but should still provide disabled persons parking. The maximum standards for car parking outlined in the London Plan take account of PTAL as well as

London Plan spatial designations and use classes, and the supporting text further outlines that developments in town centres generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people living there.

Policy T6 makes clear that an absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets, whilst further stating that the redevelopment of sites should reflect the current approach to parking and not be re-provided at previous levels where this exceeds the maximum parking standards.

The maximum car parking standards, disabled persons parking, and the provision of electric or other Ultra-Low Emission vehicles are set out in Policy T6.1 to Policy T6.5, however it should be noted that for all development types in PTAL 5 or 6, or within the Central Activities Zone, proposals are expected to be car-free.

Policy T6.1 of the London Plan (Residential parking) states that new residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category. Policy T6.1 further sets out that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling should be available from the outset and these spaces must be for residents' use only (whether M4(2) or M4(3) dwellings), not be allocated to specific dwellings, unless provided within the curtilage of the dwelling, and explains that these spaces should count towards the maximum parking provision for the development.

Policy T6.5 (Non-residential disabled persons parking) also sets out that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with and designated bays should be marked up as disabled persons parking bays from the outset.

## CAR PARKING PROVISION

At ground floor level within the Falling Lane site, 13 car parking spaces (including 5 wheelchair accessible spaces) are proposed for residential use and 15 car parking spaces (including 2 wheelchair accessible spaces) are proposed for use by Rabbsfarm Primary School. Parking for the different users would be separated into two undercrofts with a security gate preventing public access into the main part of the building, together with three external spaces for use by Rabbsfarm School near to the vehicle entrance on Falling Lane

On the Otterfield Road site, a total of 23 residential car parking spaces (including 5 wheelchair accessible spaces) and 2 car parking spaces for the library (both wheelchair accessible) are proposed, to be laid out around the northern and eastern edges of the building, to be accessed from the road connecting Otterfield Road and the Fairfield Road car park.

This amounts to a total provision of 36 residential car parking spaces split across the two sites (including 10 wheelchair accessible spaces), 15 car parking spaces for Rabbsfarm Primary School within the Falling Lane site and 2 car parking spaces for the replacement library at the Otterfield Road site.

In accordance with Policy T6.1, applying the more restrictive parking standard when a site falls into more than one category, it is considered that the application site has a PTAL of 3, which is considered to represent a moderate level of access to public transport (on a scale of 0-6b, where 0 is the worst and 6b is the best). In this instance, the maximum parking standards would allow for up to 80 parking spaces (applying a ratio of 0.75 spaces for every one and two bedroom unit, and 1 space for every three bedroom unit), but Policy T6 of the London Plan makes clear that the starting point for all proposals in places that are (or are planned to be) well connected by public transport should be car free, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Further regard is had to Policy H1 of the London Plan which requires the potential for housing delivery on all suitable and available brownfield sites to be optimised, especially for sites with existing or planned PTALs of 3-6, or which are located within 800m of a station or town centre boundary. The application site has a PTAL of 3, is within a town centre and is within 800 metres of West Drayton train station and it is therefore imperative that the site is optimised in accordance with Policy H1 of the London Plan, and that parking provision does not compromise the high proportion of affordable housing provided within this scheme.

The council's Highways Officer has confirmed that owing to the site's PTAL and town centre location, any redevelopment of the site should seek to provide significantly lower than the maximum residential car parking standards of the London Plan, and parking should be restricted to wheelchair accessible spaces only. This approach is generally supported, however it is noted that whilst there are some on-street parking restrictions near to the Falling Lane site, there are no on-street parking restrictions in the immediate vicinity of the proposed Otterfield Road site (i.e. Otterfield Road, which experiences relatively high levels of on-street parking stress as raised through the public notification process).

The proposed level of parking would provide wheelchair accessible spaces for 10% of the total number of dwellings to reflect the number of wheelchair accessible units which would be created. This amounts to 10 spaces, 5 within each plot, which is supported.

In addition, within the Falling Lane site, there would be 8 additional residential spaces, one each for the number of larger family homes (3+ bedrooms), recognising that whilst the site has potential car-free credentials, there is a known need for some level of parking for larger affordable homes, as identified by the council's Housing Officer, and on this basis, the proposed level of on-site parking is considered a proportionate response to the site's context but also the needs of the end users. The Falling Lane site also includes provision for 15 'park and stride' parking spaces for use by Rabbsfarm primary school, replacing 16 which currently existing within the Falling Library car park.

Within the Otterfield Road site, 23 residential car parking spaces are proposed inclusive of 5 wheelchair accessible spaces, which again is considered to reflect a car-lite approach to the site, with a higher proportion than the Falling Lane site to reflect more three-bedroom units but also less on-street parking restrictions. This level of provision is considered to reflect the Otterfield Road building's slightly different context. Two wheelchair accessible parking spaces are proposed for use by library users, which is considered appropriate for a library in a town centre location, and it is recognised that Fairfield Road car park has spare capacity adjacent to the site.

## MEASURES TO ENCOURAGE SUSTAINABLE TRAVEL

### Active Travel Zone Assessment

An Active Travel Zone Assessment has been undertaken to identify 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:

Works to improve the Y29 footpath £38,276  
Pedestrian access to the Park from Otterfield Road £35,000  
Bus Shelter works (High Street) £22,500  
Tactile Paving/Dropped Kerbs/Localised Parking restrictions £5,500  
Santander Bike Scheme; £17,500  
New Seating/Bench installation £6,000  
New Bin installations £700  
TOTAL: £125,476;

#### Parking Management Scheme Review

As set out above, Policy T6 makes clear that an absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets. As such, whilst it is recognised that the implementation of parking controls to nearby roads can only commence in response to a public petition, a financial contribution towards consulting on extending parking management schemes onto the surrounding roads (including but not limited to Falling Lane, Gordon Road and Otterfield Road).

It is considered reasonable and proportionate to secure a financial contribution towards the review of local roads 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 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

Cycle parking provision would be provided at both sites in accordance with London Plan standards, with 90 spaces (provided in two stores at ground floor level) within the Falling Lane site and 88 spaces (provided in three stores at ground floor level) for residential use. A further 10 short-stay spaces would be provided for the library. A condition requiring compliance with the London Cycling Design Standards would be included in the decision notice.

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 CHARGING 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 the 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

A Servicing and Delivery Plan would be secured by condition.

#### CONSTRUCTION LOGISTICS PLAN

A Construction Logistics Plan would be secured by condition.

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

Urban Design and Accessibility are addressed at Section 7.07 and Section 7.12 respectively.

### **SECURED BY DESIGN**

Policy D11 of the London Plan (Safety, security and resilience to emergency) sets out that boroughs should work with the Metropolitan Police Service's 'Design Out Crime' Officers to identify the community safety needs and necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Proposals should seek to maximise building resilience and minimise potential physical risks, and should include measures to design out crime that deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. Measures to design out crime, including counter terrorism measures, should be integral to proposals, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) encourages the creation of safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson, having regard to Secure by Design standards.

Whilst no response has been received from the Secured by Design Officer, a condition requiring both sites to achieve secured by design accreditation in consultation with the Metropolitan Police to ensure the proposal meets the requirements of Policy D11 of the London Plan and Policy BE1 of the Hillingdon Local Plan. On this basis, the proposal is considered acceptable in this regard.

## **7.12 Disabled access**

Policy D5 of the London Plan (Inclusive design) sets out that proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all. 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, and proposals should ensure they are compliant with Policy D12 of the Plan (Fire safety) and place fire resilience central to the proposal's design.

To provide suitable housing and genuine choice for London's diverse population, including disabled people and families with young children, Policy D7 of the London Plan (Accessible housing) states that all residential development should include 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' and 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'.

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) requires 10% of new dwellings to be wheelchair accessible, encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives. In addition, all proposals should incorporate a

clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services.

The Council's accessibility officer raised queries regarding accessibility across the sites which the applicant team responded to in full. The scheme delivers on-site disabled parking, M(4)3 and M(4)2 units are proposed, evacuation lifts on site that meet current days standards alongside numerous other measures that would make both the residential developments and library facilities proposed fully inclusive and accessible. The proposed development is therefore considered to accord with Policy D5 of the London Plan (2021).

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

Policy H2 of the Local Plan: Part One (2012) requires sites with a capacity of 10 or more units to provide an affordable housing mix to reflect the housing needs in the borough, particularly the need for larger family units. Policy H4 of the London Plan (Delivering affordable housing) sets the strategic target of 50% of all new homes delivered across London to be genuinely affordable. As such, all developments that trigger the affordable housing requirements (10 units or more) should provide affordable housing through the threshold approach (discussed below), using grants to increase affordable housing delivery beyond further. Affordable housing can be provided off-site or as a cash in lieu contribution in exceptional circumstances.

Policy H5 of the London Plan and Policy DMH7 of the Hillingdon Local Plan: Part Two require a minimum of 35% affordable housing. To follow the fast track route and not be required to submit a financial viability assessment, applicants must meet the following criteria:

- a minimum of 35 per cent without public subsidy
- 50 per cent for public sector land
- 50 per cent on existing industrial land
- Be consistent with the relevant tenure split (70/30 social rent/intermediate).

Policy H6 of the London Plan (Affordable housing tenure) states that affordable housing products within a development should include a minimum of 30% low-cost rented homes (including London Affordable Rent or Social Rent), 30% intermediate products which meet the definition of genuinely affordable housing (including London Living Rent and London Shared Ownership), with the remaining 40% to be determined by the borough based on identified need. There is a presumption that the 40% to be decided by the borough will focus on Social Rent and London Affordable Rent, given the level of demand for this type of tenure across London.

Part B of Policy H6 further explains that the Fast Track route is also available to applicants that elect to provide low-cost rented homes in place of intermediate dwellings, provided the relevant threshold level (of 50% affordable housing) is reached.

Policy H10 of the London Plan (Housing size mix) states that schemes should generally consist of a range of unit sizes, having regard to the requirement to deliver mixed and inclusive neighbourhoods, the need to provide a range of unit types at different price points, the mix of uses, the range of tenures, the nature and location of the site, PTAL, the need for additional family housing and the role of one and two-bed units in freeing up existing housing by providing an alternative to conversions and subdivisions, to optimise a site's potential. Policy DMH2 of the Local Plan seeks a mix of units that reflects the latest information on need. The 2018 Strategic Housing Market Assessment identifies an overwhelming need for family-sized homes.

The proposal seeks to provide 50% affordable housing (by unit and habitable room), with the Falling Lane site accommodating the entire affordable housing requirement. The Otterfield Road site will provide private market homes. The proposed proportion of affordable housing meets the minimum threshold requirement for the fast track route set out London Plan policy of 50%. However, the proposal does not provide the prescribed tenure mix as all of the affordable units would be for London Affordable Rent (LAR). This would appear to create a requirement for a viability assessment. However, as noted above, policy H6 of the London Plan states that the fast track route is also available to applicants who elect to provide low-cost rent homes in place of intermediate homes provided the overall unit threshold is reached. Given that all affordable housing will be LAR, a low-cost product, the scheme would accord with London Plan policy H6, and no viability assessment is required.

The Council's Housing Officer supports this approach has been consulted and has confirmed that low-cost rented housing (such as LAR) has been identified as the tenure in highest demand within the borough, and the provision of increased levels of low-rent affordable housing would help to address the growing number of households on the Housing Register. The Council has a statutory duty to house applicants on the Housing Register, and intermediate tenures are often unaffordable for these households.

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

### **TREES**

Policy G5 of the London Plan (Urban Greening) states that major developments 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. The Mayor recommends that boroughs seek an Urban Greening Factor (UGF) target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses). In broad terms, the UGF is an assessment of the amount, type and value of natural environment provided on site as a proportion of the overall site area. The assessment assigns each landscape type (e.g. Semi-natural vegetation, intensive green roof to depth of 150mm, extensive green roof to depth of 80mm, amenity grassland, etc) with a 'factor' (1, 0.8, 0.7 and 0.4 respectively for the landscapes listed above). These factors are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaption and biodiversity conservation.

Policy EM4 of the Hillingdon Local Plan: Strategic Policies (Open Space and Informal Recreation) states that the network of open spaces will be safeguarded, enhanced and extended, recognising their role in serving local communities and encouraging active lifestyles by providing spaces within walking distance of homes. There will be a presumption against any net loss of open space in the Borough and major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities.

Moreover, the council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) for the benefit of wildlife and a healthier lifestyle.

Whilst there have been numerous concerns raised by local residents about the loss of recreation and parkland, the proposals at both Falling Lane propose no development within



or on the existing park. Both land parcels comprise brownfield and previously developed land which currently houses the existing library and the former Pool site.

The proposals also include the delivery on site greening and public realm enhancements such as a new pedestrian link into the new Otterfield Road and library site and enhanced activity and natural surveillance from both developments.

Respectively the sites will deliver a UGF of 0.38 and 0.3 against a target of 0.4. Whilst this is below the target set out in Policy G5 of the London Plan 2020, it is noted that the UGF target is a guide. The applicant is also proposing a suite of improvements to the adjoining recreation ground which include new playground, improved pedestrian access and boundary treatment on the Otterfield Road site and footpath, tree planting, footpath upgrade and ramp upgrade. The improvements are a significant benefit to the existing and future residents and park users and will be secured via legal agreement.

The submitted documentation indicates that there are 10 trees proposed to be removed on the Falling Lane site and no trees will be removed on the Otterfield Road site with measures proposed for tree protection. The parkland proposals (mentioned above) include further new tree planting which will compensate for the losses on site.

Subject to such securing a legal agreement and conditions, the proposal would accord with Policies G1 and G5 of the London Plan (2021) and Policies DMEI 1, DMHB 14 and DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

## ECOLOGY

Policy EM7 of the Hillingdon Local Plan: Strategic Policies (Biodiversity and Geological Conservation) seeks to protect biodiversity features from inappropriate development, and encourages the provision of biodiversity improvements from all developments, including green roofs and walls where feasible.

An ecological enhancement strategy was submitted with the application and it proposes that each building should include two Vivara Pro WoodStone house sparrow terrace boxes (or house sparrow boxes of a similar design) to encourage colonisation of the site by this species of conservation concern and one WoodStone Swift Nest Box to provide nesting opportunities for this declining species, known to be present in the area. This has been conditioned.

A condition is also proposed to secure badger surveys at the Otterfield Road site, which would need to be conducted prior to the commencement of development. The proposed on site and off-site parkland improvements will provide ecological enhancements locally. 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 SI 7 (Reducing waste and supporting the circular economy) and Policy D6 (Housing quality and standards) of the London Plan require developments to be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

Policy EM11 of the Hillingdon Local Plan: Strategic Policies (Sustainable Waste Management) states that the council will aim to reduce the amount of waste produced in

the borough. To achieve this, the council will require all new developments 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.

Refuse collection points are proposed on-site at the Otterfield Road site, the quantum of storage proposed as well as the collection arrangements are all considered to be acceptable and no objection is raised to the proposed arrangements.

Refuse collection for the Falling Lane site comprises of bin stores which offer sufficient storage capacity and on collection days, would require refuse trucks to collect from Falling Lane. The initial plans had proposed two collection points at different points along Falling Lane, one of which would have been located close to the junction of Falling Lane and the High Street. Following objections raised by Highways and the Waste Officer, this second collection point (closest to the junction of Falling Lane and the High Street) has now been removed. The new arrangements will require a management scheme, whereby bins are dragged on collection day to a single collection point and then returned to the bin stores once emptied. A condition to secure this arrangement in perpetuity is proposed to be attached to the grant of permission.

Subject to conditions attached to the decision notice, the development is considered to accord with policy SI 7 of the London Plan, Policy EM11 of the Local Plan Part 1 and Policy DMHB11 of the Local Plan Part 2.

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

Policy SI 2 of the London Plan (Minimising greenhouse gas emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy, placing an additional requirement to monitor emissions beyond implementation to determine the effectiveness of the mitigation:

1. be lean: use less energy and manage demand during operation
2. be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
3. be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
4. be seen: monitor, verify and report on energy performance.

Policy SI 2 sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013.

Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and how a minimum on-site reduction of at least 35% beyond Building Regulations will be achieved. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures alone. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site, provided that an alternative proposal is identified and delivery is certain.

Moreover, major development proposals should calculate and minimise carbon emissions

from any other part of the development, including plant or equipment, that are not covered by Building Regulations (i.e. unregulated emissions).

In addition, Policy SI 3 of the London Plan (Energy Infrastructure) states that all major development proposals shall explore opportunities to maximise the use of on-site renewable energy generation and incorporate demand-side response measures.

Policy EM1 of the Hillingdon Local Plan: Strategic Policies (Climate Change Adaptation and Mitigation) sets out that the installation of renewable energy will be encouraged for all new developments.

Neither of the proposed development sites comprising the wider application boundary achieve the zero carbon requirements onsite as set out in the London Plan albeit it the proposals do include some on site renewable technologies. Consequently there is a need for an offsite contribution to the Council's Carbon Offset Fund. These equate to:

Otterfield Road - £27,360  
Falling Lane - £22,230

In addition, the energy strategy is very broad and is heavily reliant on photovoltaic panels that are not sufficiently detailed to enable an understanding of the final type, size, orientation or fitting and in turn how the carbon savings will be achieved. A condition to secure further details is therefore proposed to seek further details of the renewable technologies proposed on site.

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

Policy SI 12 of the London Plan (Flood risk management) sets out that flood risk across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities and developers where relevant. Proposals should further ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses. Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading.

In addition, Policy SI 13 of the London Plan (Sustainable drainage) sets out that proposal should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Moreover, drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

Policy EM6 of the Hillingdon Local Plan: Strategic Policies (Flood Risk Management) encourages development to be sited away from the areas of highest flood risk (Flood Zones 2 and 3), and all development will be required to use sustainable urban drainage systems (SUDS).

The application is supported by an FRA and Drainage Plan. The proposals indicate that there is no runoff from the site and a green roof is proposed. These measures are supported by the Councils Flooding Officer. Further cross-sectional detail is provided of the green road and how this will work and the initial flush of water that this will control.

Subject to the above condition, the proposals are considered to accord with policies SI 12 and SI 13 of the London Plan.

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

### **NOISE**

Policy D13 of the London Plan (Noise) states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances with necessary and appropriate provisions including ongoing and future management responsibilities, and proposals should seek to separate new noise-sensitive development from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

Policy D14 of the London Plan (Agent of Change) sets out that proposals should mitigate and minimise 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, improving and enhancing the acoustic environment and promoting appropriate soundscapes. Proposals should first seek to separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials, in preference to sole reliance on sound insulation. 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, promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

It is generally accepted that noise emanating from residential properties is lower than commercial premises, and industrial uses are associated with the highest noise profile.

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) states the council will promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected by new developments. As such, the council will seek to ensure that noise sensitive development and noise generating development are only allowed if noise impacts can be adequately controlled and mitigated.

In support of the application, a Noise Impact Assessment has been submitted, which assesses the existing noise conditions at both sites and the potential suitability of the noise environment for the proposed residential uses, and identifies that there are some noise constraints associated with both sites, noting the town centre locations. The report includes a number of recommendations including mitigation measures in the form of sound insulation within the external building fabric, glazing and mechanical ventilation. These noise protection measures would be controlled by way of condition.

### **AIR QUALITY**

Policy SI 1 of the London Plan (Improving air quality) states that proposals should not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, so as not to create unacceptable risk of high levels of exposure to poor air quality.

As such, as a minimum, proposals must be at least Air Quality Neutral and should use

design solutions to prevent or minimise increased exposure to existing air pollution, whilst making provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

Major development proposals must be submitted with an Air Quality Assessment. Proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) requires all development to protect both existing and new sensitive receptors, and not result in the deterioration of local air quality. In addition, all major developments within Air Quality Management Areas (AQMA) should be air quality neutral whilst actively contributing to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels.

The proposed development is located within the LBH AQMA, with the Falling Lane site within the West Drayton/Yiewsley Focus Area (FA), and the Otterfield Road site within the FA catchment area, bringing additional traffic emissions which will add to current likely exceedances. New developments should 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.

The proposed development would not be air quality neutral and therefore further action is required to reduce emissions, and these can include off-site mitigation measures. The level of mitigation required to the proposed development for traffic emissions is £18,526 and this would be secured through the s106 agreement. In addition, two air quality conditions are required to develop and implement a Low Emission Strategy and manage construction emissions.

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

Neighbour comments received have been addressed throughout the body 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. 50% on site Affordable Housing (50 units) to be delivered as London Affordable Rent (LAR) dwellings;
  - 18 one-bedroom units
  - 24 two-bedroom, units
  - 8 three-bedroom units.
- ii. Library re-provision (no loss of library provision);
- iii. Air Quality Contribution: A financial contribution amounting to £18,526 shall be paid to address the air quality impacts of the proposed development;
- iv. Carbon Offset Contribution: A financial contribution amounting to £27,360 for the Otterfield Road development and £22,230 for the Falling Lane development shall be paid to the Council's carbon offset fund;
- v. Public Open Space: Submission of a detailed Plan for the upgrade of the park to include, but not limited to, new playground, improved pedestrian access and boundary treatment on the Otterfield Road site and footpath, tree planting, footpath upgrade and ramp upgrade;
- vi. Highways Works and S278 works;
- vii. Local Highways Improvements/ATZ works: A financial contribution amounting to £125,476 to deliver:

Works to improve the Y29 footpath £38,276  
 Pedestrian access to the Park from Otterfield Road £35,000  
 Bus Shelter works (High Street) £22,500  
 Tactile Paving/Dropped Kerbs/Localised Parking restrictions £5,500  
 Santander Bike Scheme; £17,500  
 New Seating/Bench installation £6,000  
 New Bin installations £700  
 TOTAL: £125,476;

- viii. Parking Management Scheme Review: A financial contribution amounting to £40,000 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;

ix. 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;

x. 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 (including future Parking Management Schemes which are introduced), apart from Blue Badge holders and a charge made against the site to ensure the future buyers are aware of the parking restrictions;

xi. 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;

xii. HUDU Health Contribution: A financial contribution amounting to £65,689 shall be paid to the Council for the enhancement of health infrastructure provision;

xiii. Falling Lane site; Retention in perpetuity of 15 car parking spaces for Raabs Farm school pick up and drop off;

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

All financial contributions will be required prior to the commencement of the development.

#### COMMUNITY INFRASTRUCTURE LEVY (CIL):

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

From 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100 sqm or more are 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 proposed development would be CIL liable for £590,119.56 under the London Borough of Hillingdon's CIL Charging Schedule, and would be MCIL liable for £269,851.09 under the Mayoral CIL Charging Schedule.

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

Not applicable to the consideration of this application.

## **7.22 Other Issues**

### **LAND CONTAMINATION**

Policy DME1 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.

Contamination Risk Assessments for both sites were submitted in support of the application and reviewed by the council's contamination officer. There is the potential for some levels of site contamination, noting the previous use of the Otterfield Road site as a swimming pool and the current use of the Falling Lane site as a car park, both of which have the potential for the leaching of contaminants into the soil. Consequently, conditions requiring an updated desktop study for the Falling Lane site and a written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified for both sites have been included within the decision notice.

### **FIRE SAFETY**

In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the London Plan states that all proposals must achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside spaces for fire appliances to be positioned on, provide suitable access and equipment for firefighting which is appropriate for the size and use of the development, and provides spaces which are appropriate for use as an evacuation assembly point.

Buildings should be designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire by being constructed in an appropriate way to minimise the risk of fire spread. This should include appropriate fire alarm systems, passive and active fire safety measures, suitable and convenient means of escape and an associated robust evacuation strategy which can be periodically updated and published, and which all occupants can have confidence in. These measures should be set out in a Fire Strategy, prepared by a suitably qualified fire engineer.

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) encourages the creation of safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson, having regard to Secure by Design standards.



In support of the application, a Fire Statement and Fire Safety comments have been submitted which discuss the means of escape for future residents including an evacuation strategy, evacuation lifts, fire-protected stairways and evacuation assembly points. The Fire Statement further sets out active fire safety measures including fire detection alarm systems and automatic water fire suppression systems (i.e. an automatic sprinkler system). A condition requiring compliance with the relevant fire safety standards is included in the decision notice.

## 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 £65,689 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.

There have been significant neighbour concerns received with regard to the impact of development on the local infrastructure of the West Drayton and Yiewsley area including

but not limited to the need for improved GP facilities and the loss of the library facility and the recreational use of the pool site. As set out in Section 7.01 of this report, the development will not result in the loss of library facilities, the application proposes a new purpose built library facility which is of a larger size on the Otterfield Road site. In addition, the former Yiewsley Pool site was closed some time ago and permission was recently granted for a new leisure centre at Rowlheys Place in West Drayton (ref: 75127/APP/2019/3221). This development is in the early stages of construction with some site clearance having already taken place with work on the main site due to commence later this year. The new Leisure Centre at Rowlheys Place will deliver a range of facilities including indoor play pitches, an eight lane swimming pool and splash pool and a rooftop football pitch.

Neighbouring residents raise concerns over the lack of GP facilities in the local area. The existing Yiewsley Health Centre site (located close to West Drayton station) recently undertook some works to improve the health centre facilities utilising S106 monies, this included the conversion of some vacant space on the site into additional clinical accommodation. The Council are working closely with the NHS/CCG to identify the longer term needs of the health centre and deliver wider improvements to services locally. In this regard, this development is also required to provide a Health S106 contribution which will assist in delivering the long term needs.

The proposal will also 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).

## 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.

It is envisaged that Mechanical Ventilation with Heat Recovery is likely to be needed on the Falling Lane site to allow for ventilation during times when windows need to remain closed due to external elements such as noise or air quality, some windows are likely to require the incorporation of low emissivity coatings to limit overheating while ensuring adequate daylight. 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).

## 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 Probitry in Planning, 2009.

## Planning Conditions

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

## Planning Obligations

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

## Equalities and Human Rights

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

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

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

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

Not applicable

## **10. CONCLUSION**

The proposal is considered to be acceptable in principle, making effective use of two town centre brownfield sites within the Heathrow Opportunity Area to provide additional housing, and notably provide 50% affordable housing (50 units), secured as London Affordable Rent, with an improvement to the provision of community floorspace for local residents as a result of the larger replacement library. The proposals do not involve any development on Metropolitan Open land (the local plan designation which protects the public park).

The proposed Falling Lane building's overall scale, density, and layout is considered to respond well to its context, stepping up appropriately from the undeveloped parkland and lower-scale housing and High Street buildings. The proposed detailed design is of high quality, with the proposed Falling Lane building providing a coherent frontage at all levels facing onto the public highway whilst optimising the site's layout to include ground-floor parking and a communal garden, with front doors onto Falling Lane and High Street reinforcing the proposed residential character.

The planning assessment identified the proposed Otterfield Road development as a tall building. The proposed building would have a varied height, and it is considered that its overall up-and-down, stepped appearance helps reduce its perception of scale, with detailed design features that give the building a human scale. It is accepted that the proposed development site is not in an area suitable for tall buildings, leading to moderate conflict with the 'locations' part of policies D9 and DMHB10.

However, the design of both buildings, including their massing, scale, bulk and detailed architecture, is considered appropriate for the location, seeking to optimise densities in sustainable brownfield locations. The development will also make a positive contribution by providing new homes that meet the borough's identified needs, bringing an underused brownfield site into use, providing a more extensive public library, and supporting improvements to the adjoining park and public realm of the town centre. These benefits are given significant weight. Therefore, on balance, the proposal's benefits far outweigh the limited harm caused by the identified partial policy conflict of the Otterfield Building to tall building policy. Having due regard to the need to optimise the use of the site, the impacts on townscape, residential amenity and local transport impacts are all considered to be acceptable. The development fully complies with policies GG2, SD1, D1, D2 and D3 of the London Plan.

Due to the siting of both buildings and separation distances between facing windows, the residential amenity of nearby properties would be acceptable in terms of access to natural light, outlook or a loss of privacy. The quality of accommodation proposed is considered to be to a high standard with sufficient outlook and access to natural light within the future units and amenity spaces, with all units meeting the minimum space standards of the London Plan.

The level of parking proposed is considered to reflect the town centre location and help achieve the Mayor's strategic target of 80% of all trips to be made using sustainable transport. In addition, financial contributions towards consulting on extending nearby Parking Management Schemes and excluding future occupiers of the new developments from being eligible for parking permits would be secured in the legal agreement.

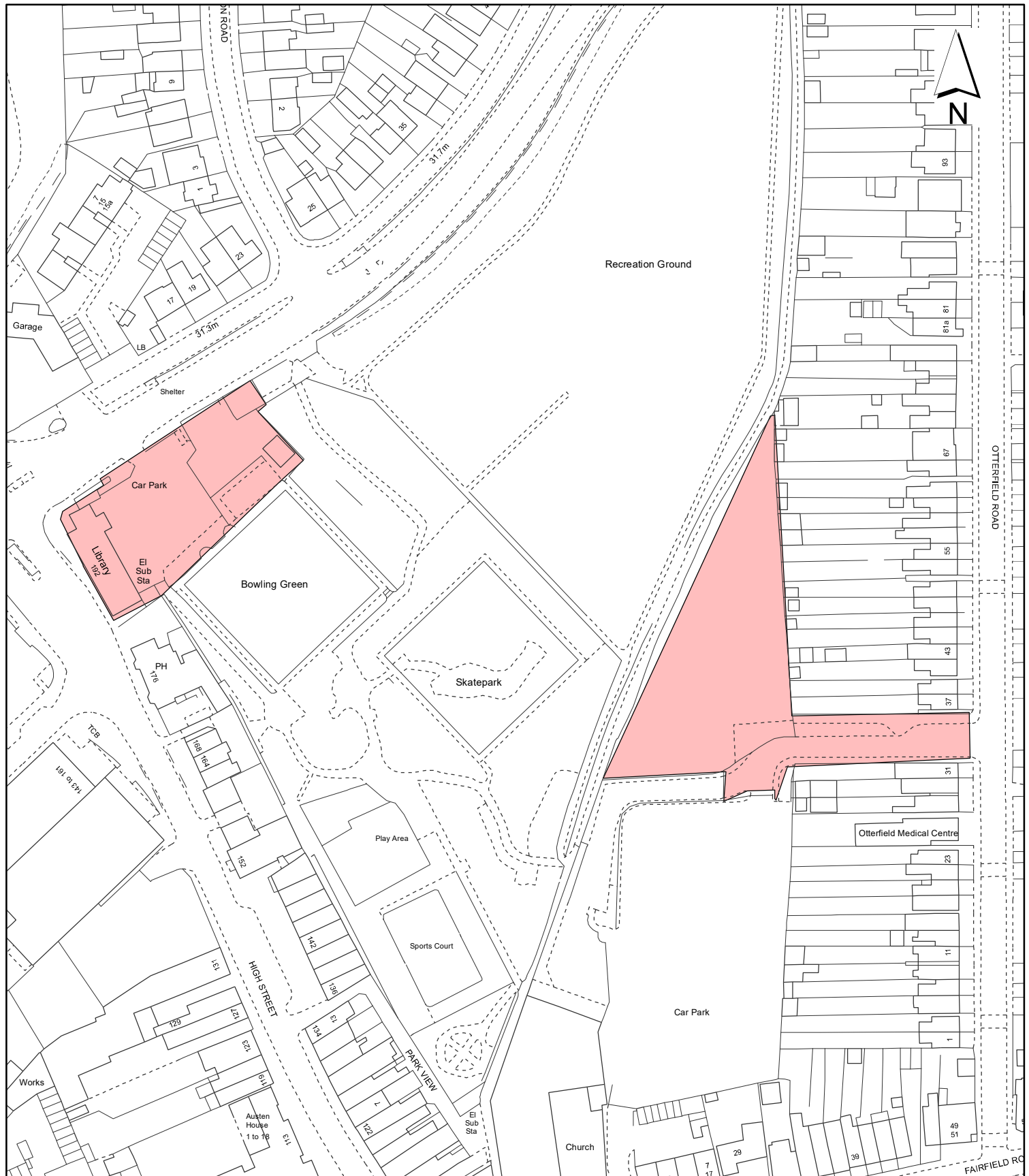
Overall, the proposal is considered to bring forward a number of significant benefits, namely the high provision of affordable housing explicitly targeted at addressing the tenure in the highest demand within the borough, and several on and off-site improvements, including improvements to the public park, the public realm within Yiewsley Town Centre, health contributions. Material considerations, therefore, indicate that the scheme's benefits are such that planning permission should be granted, subject to the conditions outlined in this report and the obligations outlined in the heads of terms.

## **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)

**Contact Officer:** Andrew Thornley

**Telephone No:** 01895 250230



### Notes:

 Site boundary

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Site Address:

**Falling Lane and Otterfield Road**

Planning Application Ref:

**76795/APP/2021/3704**

Planning Committee:

**Major**

Scale:

**1:1,500**

Date:

**February 2022**

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

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



**HILLINGDON**  
LONDON