

Report of the Head of Planning, Transportation and Regeneration

Address LAND AT AUSTIN ROAD HAYES

Development: Hybrid planning application seeking OUTLINE permission (with all matters reserved) for residential floorspace (Class C3) including demolition of all existing buildings and structures; erection of new buildings; provision of a community centre (up to 140sq.m of Use Class F2(b) floorspace); new pedestrian and vehicular access; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse storage, servicing area and other works incidental to the proposed development; and FULL planning permission for Blocks A and B comprising 80 residential units (Class C3); new pedestrian and vehicular access; associated amenity space and landscaping; car and cycle parking; refuse storage, servicing area, and other associated infrastructure to include temporary highways and landscaping works.

Details: Comprising a maximum of 500 residential units and (Use Class C3) and 140sq.m of community floorspace (Use Class F2(b)) at ground floor in a series of buildings ranging in height from 2 to 12 storeys with associated access and car parking for 113 vehicles and 912 cycle parking, landscape and amenity areas and associated servicing.

LBH Ref Nos: 76550/APP/2021/4499

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Biodiversity Impact Assessment
 Preliminary Ecological Appraisal (including Bat Survey Report)
 Geotechnical and Geo-environmental Desk Study Report
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 Construction Logistics Plan
 Daylight and Sunlight Report (including Overshadowing Assessment)
 Delivery and Servicing Plan
 Economic Impact Assessment (including Social Value Assessment)
 (appended to Planning Statement)
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 Overheating Risk Assessment (for Detailed First Phase)
 Financial Viability Assessment
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 Illustrative Signage Details (incorporated into Landscape Strategy)
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 Noise Assessment
 Foul Sewage and Utilities Statement
 Transport Assessment
 Framework Residential Travel Plan
 Water Cycle Strategy (incorporated into Energy Statements and Drainage Strategy)
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Date Plans Received:	10/12/2021	Date(s) of Amendment(s):	11/03/2022
Date Application Valid:	17/12/2021		10/03/2022
			10/12/2021
			17/12/2021

1. SUMMARY

This 'hybrid' planning application proposes a comprehensive residential-led, mixed-use development involving phased demolition of all existing buildings. It will provide up to 500 new residential units, new publicly accessible open space, associated access, servicing, and landscaping, car and cycle parking. The application comprises two parts:

1. A Full application covering Phase 1 of the proposed development, which is for 80 new homes comprising 40 Social Rented homes and 40 private market homes; and,
2. An Outline application covering Phases 2-5 of the proposed development for a further 420 homes and a replacement community space of up to 140 sq m. Further details are to be submitted for approval at the reserved matters stage.

The proposed development will be delivered over five phases. The first phase is expected to commence in Autumn 2022, the second phase to begin in Spring 2024, Phase 3 in Summer 2026, Phase 4 & 5 in Spring 2028, with completion of the development in Autumn 2029.

The application for Phase 1 seeks detailed planning permission for a single podium building comprising two blocks (A & B), accommodating 80 new homes with a GIA of 5,948 square metres. This phase is at the northern end of the site facing Pump Lane and is predicted to start in Autumn 2022 (subject to planning approval).

After that, four further phases are proposed, starting in the north of the site and moving south toward the canal. The final phase will deliver new buildings on land currently occupied by Austin Road, which will be realigned.

If outline planning permission is granted for the final four phases, any details reserved for future consideration would be the subject of future reserved matters applications (RMA). The matters for consideration as part of the outline element of this planning application are; the principle of the development, with all other issues, i.e. Access, Appearance, Landscaping, Layout and Scale reserved for future consideration (the reserved matters applications/RMAs). However, the Parameter Plans submitted set maximum criteria for heights, land uses, and indicative layouts that have been deemed acceptable, subject to the final detailed design.

As per the Officer's recommendation for approval, several planning obligations would be secured by Section 106 legal agreement and would contribute to mitigating any impacts that may arise from the proposed use. These include a travel plan, a contribution towards a Parking Management Scheme Review, parking permit restriction and Active Travel Zone improvements. Subject to securing these measures, the proposal is considered acceptable with regard to its impact on the local highway network.

The affordable housing offer is agreed as the maximum viable. The proposed affordable tenure mix provides an uplift in affordable rented housing, which is a notable benefit of the scheme and fully complies with Policy H8 of the London Plan.

Existing crime issues associated with the estate are partly driven by the layout of the estate; which has various areas lacking surveillance and lots of poorly designed, confined spaces, which do not feel safe at night-time. The proposals enable a completely new layout, that addresses the failings of the existing layout. The Metropolitan Police Crime Prevention Officer has been involved at both pre-application and application determination and supports the proposals.

The proposed scale and mass of the development are considered appropriate within the context of the site. The quantity of private amenity space offered would fall slightly short of the development plan standards creating a minor policy conflict which has been afforded limited weight. Sufficient play space would be provided, alongside new areas of public open space. It should also be noted that the proposals are an estate regeneration scheme, and there is a significant improvement proposed over existing areas of private and public amenity space. In addition the new layout is designed to create a safe and welcoming environment. A slight deficit against the Urban Greening Factor target of 0.4 has also been identified. However, again, this has been afforded minimal weight given the potential to improve the situation through the reserved matters applications.

The layout of the development is defined by five urban blocks. The urban blocks are designed to provide maximum frontages onto streets and will define public, communal and private space. The blocks will run from Pump Lane to Western View in a south-westerly alignment. Three compact urban blocks are located between the Crown Close and Austin Road and a larger urban block is proposed to be located in the south of the site supporting an increase in scale along the Grand Union Canal. A narrower plot is also proposed on the east side of Austin Road that will complete a perimeter block with the adjoining houses on Little Road. The proposals will create a new legible route that connects the site to the High Street via Crown Close and will include a new shared public space called Community Square. Community Square would create a focal point for the regenerated neighbourhood and would create a unobstructed pedestrian link from the High Street to Silverdale Road to the east. The square will reinforce legibility by providing an identifiable urban space at the centre of the site and will provide a suitable setting for the community centre.

The southernmost end of Silverdale Road is also proposed to be redesigned to create an

improved pedestrian connection to the canal. New apartment buildings will front onto the canal to provide activity and surveillance the blocks of which would align with the consented development to the east (1 Silverdale Industrial Estate). The proposals will also introduce residential streets between Crown Close and Austin Road, defining three of the urban blocks. These streets will have a different character and scale, creating variety and a sense of place. This will improve connectivity through the new neighbourhood creating a more coherent and legible street network and would bring significant improvements to the area.

The illustrative outline masterplan is considered to be well conceived and of a high quality design.

The scheme has been fully appraised against relevant policies relating to estate renewal, affordable housing provision, open space, residential amenity, tall buildings, design, highways, and sustainability. It will deliver an additional 260 new homes in an accessible location within walking distance of the Hayes and Harlington Elizabeth Line station. Of the new homes, 53.8% will be affordable (by habitable room), including a 40 unit uplift in the number of affordable rented homes. This will make a significant contribution to local housing needs. The development layout will see the creation of a new public square and the improvement of the east-west links across the site and down to the canal towpath. The re-provision of existing community space has also been secured. The level of car parking secured at 0.23 spaces per unit is considered suitable for this town centre local and is supported by the Highway Authority. The quality of amenity space provided has been assessed as good, with a slight deficit in quantum considered acceptable on balance.

Overall, the scheme delivers significant benefits, particularly the delivery of high-quality, affordable homes, new public spaces and a layout that will create a safe and welcoming environment. The many positive benefits of the proposals weigh heavily in favour of an approval recommendation.

Subject to a S106 agreement, relevant conditions and stage 2 Mayoral referral, the proposal is recommended for approval.

2. RECOMMENDATION

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

i. Affordable Housing: Planning obligation for an on-site provision of at least 199 Social Rented homes and 40 London Affordable Rented homes (equivalent to 17,863 sqm in gross floorspace and 806 habitable rooms). This shall include an Early, Mid and Late Stage Viability Review mechanism as defined by Policy H5 of the London Plan (2021).

ii. Air Quality Contribution: A financial contribution amounting to £4,778 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 reduces human exposure to nitrogen dioxide levels shall be paid to address the air quality impacts of the proposed development.

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

iv. Local Highways Improvements/ATZ: A financial contribution amounting to

£76,811 shall be paid to the Council for the local highway improvements.

v. 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.

vi. Grand Union Canal Quietway contribution amounting to £60,000 shall be paid to the Council for the enhancement of the canal towpath.

vii. Parking Permits: The residents of this development will not to be eligible for parking permits within the Parking Management Areas (within the exception of 29 permits) and Council car parks in the vicinity of the site, apart from Blue Badge holders and a charge made against the site to ensure the future buyers are aware of the parking restrictions.

viii. HUDU Health Contribution: A financial contribution amounting to £49,820 shall be paid to the Council for the enhancement of health infrastructure provision.

ix. 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.

x. A Healthy Streets final sum to be confirmed following conclusion of discussions with GLA/TfL (current request is £335,000);

xi. Community space of at least 120 sq m and to a maximum of 140 sq m shall be delivered to shell and core at a peppercorn rent;

xii. Land shown as POS on Parameter plan 5 (Hard and Soft Landscaping) shall remain in POS in perpetuity.

xiii. Carbon Offset contribution. In the event that the subsequent outline phases of the development are not net zero a carbon offset payments shall be paid to the Council's carbon offset fund relating to the outline phases of this development.

xiv. Housing Strategy; Details of the Right to Return arrangements to safeguard the returning residents;

xv. On site car club of up to 4 spaces, free membership for 3 years and £50 credit for one person per unit;

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

All planning obligations are required to be paid upon implementation in order to ensure infrastructure improvements are in place prior to occupation.

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 and any changes that may be negotiated with the GLA/TfL.

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, 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 A1 Time Limit

Time Limit and Reserved Matters applications for the Outline element

(i) The development hereby permitted shall begin either before the expiration of five years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

(ii) Application for approval of the following reserved matters shall be made to the Local Planning Authority before the expiry of three year from the date of this permission.

- (a) Siting of building(s)
- (b) Design
- (c) External Appearance
- (d) Landscaping
- (e) Means of Escape

REASON

To comply with Section 92 of the Town and Country Planning Act 1990.

2 B1 Time Limits

Time limit in relation to the detailed Phase 1 element

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.

3 COM4 Accordance with Approved Plans

The Phase 1 development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

Red Line Site Location Plan HTC-PTE-ZZ-XX-DR-A-10000 rev C2
Phase 1 Block Plan in Existing Context HTC-PTE-P1-XX-DR-A-10006 rev C3 1:200
Phase 1 Block Plan in Masterplan Context HTC-PTE-P1-XX-DR-A-10002 rev C3 1:200
Phase 1 Proposed Ground Floor Plan HTC-PTE-P1-00-DR-A-10100 rev C3
Phase 1 Proposed First Floor Plan HTC-PTE-P1-01-DR-A-10101 rev C3 1:100
Phase 1 Proposed Second Floor Plan HTC-PTE-P1-02-DR-A-10102 rev C3 1:100
Phase 1 Proposed Third Floor Plan HTC-PTE-P1-03-DR-A-10103 rev C3 1:100
Phase 1 Proposed Fourth Floor Plan HTC-PTE-P1-04-DR-A-10104 rev C3
Phase 1 Proposed Fifth Floor Plan HTC-PTE-P1-05-DR-A-10105 rev C3
Phase 1 Proposed Sixth Floor Plan HTC-PTE-P1-06-DR-A-10106 rev C3
Phase 1 Proposed Seventh Floor Plan HTC-PTE-P1-07-DR-A-10107 rev C3
Pump Lane Elevation HTC-PTE-P1-ZZ-DR-A-10300 rev C3
Austin Road Elevation HTC-PTE-P1-ZZ-DR-A-10301 rev C3
Crown Close Elevation HTC-PTE-P1-ZZ-DR-A-10302 rev C3
Connection Street Elevation HTC-PTE-P1-ZZ-DR-A-10303 rev C3
Phase 1 Courtyard Elevation North HTC-PTE-P1-ZZ-DR-A-10304 rev C3
Phase 1 Courtyard Elevation East HTC-PTE-P1-ZZ-DR-A-10305 rev C3
Phase 1 Courtyard Elevation South HTC-PTE-P1-ZZ-DR-A-10307 rev C3
Phase 1 Courtyard Elevation West HTC-PTE-P1-ZZ-DR-A-10306 rev C2
Phase 1 Sections (Section A-A - North-South) HTC-PTE-P1-ZZ-DR-A-10200 rev C4
Phase 1 Sections (Section B-B - East-West) HTC-PTE-P1-ZZ-DR-A-10201 rev C3
Phase 1 Sections (Section C-C - East-West) HTC-PTE-P1-ZZ-DR-A-10202 rev C1
Phase 1 Proposed Roof Plan HTC-PTE-P1-08-DR-A-10108 rev C3
Phase 1 Access Plan 21139-MA-XX-XX-DR-C-1110
Pump Lane Elevation HTC-PTE-P1-ZZ-DR-A-10300 rev C3
Austin Road Elevation HTC-PTE-P1-ZZ-DR-A-10301 rev C3
Crown Close Elevation HTC-PTE-P1-ZZ-DR-A-10302 rev C3
Connection Street Elevation HTC-PTE-P1-ZZ-DR-A-10303 rev C3
Phase 1 Courtyard Elevation North HTC-PTE-P1-ZZ-DR-A-10304 rev C3
Phase 1 Courtyard Elevation East HTC-PTE-P1-ZZ-DR-A-10305 rev C3
Phase 1 Courtyard Elevation South HTC-PTE-P1-ZZ-DR-A-10307 rev C3
Temporary & S278 Works Key Plan (Phase 1) HTC-TEP-P1-00-DR-L-90103 rev 02
Hardworks Plan_ - Ground Floor (Phase 1) HTC-TEP-P1-00-DR-L-90110 rev 02
Hardworks Plan - First Floor (Phase 1) HTC-TEP-P1-01-DR-L-90111 rev 02
Hardworks Plan Second Floor (Phase 1) HTC-TEP-P1-02-DR-90112
Planting Plan - Ground Floor (Phase 1) HTC-TEP-P1-00-DR-L-90120 rev 02
Planting Plan - First Floor (Phase 1) HTC-TEP-P1-01-DR-L-90121 rev 02
Planting Plan - Second Floor (Phase 1) HTC-TEP-P1-02-DR-90122

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

The Outline element of the proposed development hereby permitted shall not be carried

out except in complete accordance with the details shown on the submitted plans and 'Outline Parameter Plans'.

Parameter Plan 1 Land Uses HTC-PTE-ZZ-XX-DR-A-10010 rev C3
Parameter Plan 2 Development Zones HTC-PTE-ZZ-XX-DR-A-10011 rev C3
Parameter Plan 3 Building Heights HTC-PTE-ZZ-XX-DR-A-10012 rev C3
Parameter Plan 4 Access and Movement HTC-PTE-ZZ-XX-DR-A-10013 rev C3
Parameter Plan 5 Hard and Soft Landscape HTC-PTE-ZZ-XX-DR-A-10014 rev C3

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

4 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:

Red Line Site Location Plan HTC-PTE-ZZ-XX-DR-A-10000 rev C2
Planning Statement (inclusive of Economic Impact Assessment (including Social Value Assessment) - 10 March 2022
Design and Access Statement - March 2022
Development Specification Statement - 10 March 2022
Air Quality Assessment (including Air Quality Neutral Assessment) REF - 2104170-01 December November 2021
Arboricultural Impact Assessment [AIA] - December 2021
Archaeological Desk Based Assessment [ADBA] dated November 2021
Aviation Safeguarding Assessment Ref: EAS/P1239/R1/Issue 1 (2021)
Biodiversity Impact Assessment - March 2022
Preliminary Ecological Appraisal (including Bat Survey Report) - December 2021
Geotechnical and Geo-environmental Desk Study Report November 2021 1990-A2S-XX-XX- RP-Y-0001-00
Circular Economy Statement and Whole Life Cycle Carbon Assessment dated 03/12/2021
Construction Logistics Plan dated 06 December 2021 11 March 2022
Daylight and Sunlight Report (including Overshadowing Assessment) 26 November 2021
Delivery and Servicing Plan dated December 2021 11 March 2022
Economic Impact Assessment (including Social Value Assessment) - December 2021
Outline Energy Statement and Sustainability Strategy dated 30/11/2021
Detailed Energy Statement and Sustainability Strategy dated 30/25/11/2021
Overheating Risk Assessment (for Detailed First Phase) Project/Ref: 07890 - Hayes Town Centre - 29/11/2021
Financial Viability Assessment - December 2021
Fire Strategy (Detailed Strategy) and Completed Gateway 1 Form - November 2021
Fire Strategy (Outline Strategy) - November 2021
Wind Microclimate Impact Assessment dated November 2021
Noise Assessment - revised March 2022
Foul Sewage and Utilities Statement Project/Ref: 07890 - Hayes Town Centre December 2021
Transport Assessment dated 22/03/2022 11 March 2022
Framework Residential Travel Plan dated November 2021 11 March 2022
Water Cycle Strategy (incorporated into Energy Statements and Drainage Strategy) Ref: P450729-WW-HT-XX-RP-C-0002
Flood Risk Assessment Ref : P450729-WW-HT-XX-RP-C-0001 P5

Heritage, Townscape and Visual Impact and Tall Building Assessment - dated December 2021

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

REASON

To ensure that the development complies with the application documentation submitted in support of the proposal in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

5 NONSC Quantum

The proposed land uses within the reserved matters shall be strictly in accordance with the maximum floor area (Use Class C3 - 14,456 sqm GIA and up to 140 sq m of community facility space Class F2 (b)) up to 420 homes.

REASON

To ensure that the development is carried out in accordance with the approved plans and other submitted details and to ensure the quantum of development keeps within the parameters assessed in accordance with Policy DMHB 17 of the Hillingdon Local Plan: Part 2 (2020).

6 NONSC Housing Mix

The proposed housing mix within the reserved matters application/s shall be strictly in accordance with the following parameters:

- One bedroom units - 37%
- Two bedroom units - 45%
- Three and four bedroom units - 18%

REASON

To ensure that the development is carried out in accordance with the approved plans and other submitted details and to ensure the quantum of development keeps within the parameters assessed in accordance with Policy H10 of the London Plan (2021) .

7 NONSC Non Standard Condition - Phasing

Save in respect of development within the Detailed First Phase, no applications for Reserved Matters approval shall be submitted and no development within the Outline Area shall be commenced (except for demolition, ground and enabling work) until a Phasing Plan setting out the delivery of the phases across the Outline Area of the site has been submitted to and approved in writing by the Local Planning Authority. The Phasing Plan shall confirm the order and timing of delivery of each of the Phases.

Submission of a detailed Design Code (to include the realigned Austin Road) and Reserved Matters applications shall conform with the approved Phasing Plan. The development shall thereby be carried out in accordance with the approved Phasing Plan or any amendments thereto that may be subsequently agreed in writing with the local planning authority.

REASON

To ensure that the development proceeds in a satisfactory manner in accordance with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

8 NONSC Design Code including Austin Road realignment

Prior to commencement of any works within the outline development a detailed Design Code (to include the realigned Austin Road) shall be submitted and approved in writing and Reserved Matters applications shall conform with the approved Phasing Plan and Design Code. The development shall thereby be carried out in accordance with the approved Phasing Plan and design Code. The Design Code shall provide the following information:

Contents Sheet

1. Introduction
 - a. Purpose of the Code
 - b. The Vision (for the regeneration of the estate)
 - c. The Site (and its context)
 - d. Planning Context
 - e. Design Principles
 - f. Structure of the Code
 - g. Instructions for Use

2. Overarching Design Code Principles
 - a. Land Use and Amount
 - b. Layout
 - c. Scale and Massing
 - d. Access, Movement and Parking
 - e. Landscape and Public Realm
 - f. Private and Community Amenity Space and Playspace

3. Hayes Town Centre Masterplan
 - a. Background
 - b. Design Principles
 - c. Masterplan Layout
 - d. Typical Development Blocks

4. Character Areas and Street Types
 - a. Character and Approach
 - b. Austin Road
 - c. Pump Lane
 - d. Crown Close
 - e. Community Square
 - f. Silverdale Road
 - g. Canalside

5. Detailed Design Code Principles
 - a. Built Form and Architectural Detail
 - b. Material Strategy
 - c. Energy and Sustainability
 - d. Car and Cycle Parking Strategy
 - e. Utilities and Servicing
 - f. Waste and Recycling
 - g. Lighting Strategy
 - h. Design Standards

6. Housing Typologies
 - a. Housing Types

- b. Mews Houses
- c. Duplexes and Podium Housing Blocks
- d. Apartment Blocks

7. Glossary of Terms

REASON

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

9 A18 Density

The residential density shall not exceed 204 homes per hectare and 620 habitable rooms per hectare.

REASON

To avoid overdevelopment of the site in accordance with the Policy DMHB 17 of the Hillingdon Local Plan: Part 2 (2020).

10 A35 Height

No building or structure in the outline element shall exceed 70.37 AOD metres in height and no building or structure in the detailed element shall exceed 58.5m AOD in height.

REASON

Whilst Heathrow recognises that the existing building penetrates the Obstacle Limitation Surface. The replacement building called should not be allowed to exceed the existing elevation, as further penetration of the Obstacle Limitation Surface would not be deemed acceptable to Heathrows operation. See Advice Note 1 An Overview for further information (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-1-Aerodrome-Safeguarding-An-Overview-2016.pdf>) in accordance with the approved drawings and to accord with the requirements of Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

11 A4 Fencing to Protect Root Areas

Prior to work commencing on site of any relevant development phase, detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, groups of trees and other vegetation to be retained during construction work, shall be submitted to and approved by the Local Planning Authority. Such fencing should be a minimum height of 1.5 metres and erected prior to any demolition, removal of topsoil, and commencement of building operations and retained in position until development is completed. The land so enclosed shall be kept clear of all dumping, materials, machinery and cement mixing and the existing soil levels not altered or disturbed. No fires should be lit on the land so enclosed.

REASON

To ensure that trees and other vegetation to be retained are not damaged during construction work in accordance with policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020).

12 B10 Parking/Turning/Loading Arrangements etc.

The roads/turning/loading facilities/sight lines and parking areas (including the marking out of parking spaces) shown on the approved Phase 1 phase and within subsequent phases of the development shall be constructed prior to occupation of the development, thereafter

permanently retained and used for no other purpose.

REASON

To ensure that adequate facilities are provided in accordance with Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020)

13 COM21 Sound insulation /mitigation

Each phase of the development shall not be occupied until full and final details are provided to, and approved by, the Local Planning Authority for that relevant development phase of the sound insulation scheme(s), and any other control measures, such that ambient sound levels are no higher than the relevant internal targets within the current version of the ProPG: Planning & Noise accounting for both ventilation and overheating conditions, and to minimise levels within external amenity areas as far as practicable. Any sound generated within the development by associated plant shall be 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 EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

14 NONSC Noise

Each phase of the development shall not be occupied until full and final details are provided to, and approved by, the Local Planning Authority for that relevant development phase of any building services plant that would result in sound emitted externally, together with details of any required noise control to safeguard the amenity of the occupants of both the scheme and the neighbouring dwellings. The plant 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 s Surrounding properties in accordance with Policy EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) and Policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

15 COM6 Levels

No development in relation to the canalside and /Western View area in Phase 4 shall take place until plans of the site showing the existing and proposed ground levels and the proposed finished floor levels of all proposed buildings have been submitted to and approved in writing by the Local Planning Authority. Such levels shall be shown in relation to a fixed and know datum point. Thereafter the development shall not be carried out other than in accordance with the approved details.

REASON

To ensure that the development relates satisfactorily to adjoining properties in accordance with policy DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

16 RES7 Materials (Submission)

No development (except for demolition, ground and enabling work) within each relevant development phase of the development hereby approved shall take place until details of all materials and external surfaces, including details of balconies, for that development phase 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).

17 RES10 Tree to be retained

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

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

18 RES8 Tree Protection

No site clearance or construction work of any phase of the development hereby approved 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 within the relevant development phase 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)

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

No development shall take place of any phase of the development hereby approved until a landscape scheme has been submitted to and approved in writing by the Local Planning Authority in consultation with Heathrow Airports Ltd, the MoD, and the Canal and River Trust. 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 trees. There shall be at least 39 new trees in line with the Landscape Strategy Plan.
2. Details of Hard Landscaping
 - 2.a Refuse Storage
 - 2.b Cycle Storage to show no less than 912 spaces and 4 motorcycle spaces
 - 2.c Means of enclosure/boundary treatments
 - 2.d Car Parking Layouts (including demonstration that 5% of all parking spaces are served by electrical charging points) to show 113 spaces with active electric vehicle charging points at 20% of all parking spaces with all the remainder having passive provision.
 - 2e. 23 car parking spaces including 2 blue badge spaces shall be provided for Phase 1 and;
 - 2.f a maximum of 90 further car parking spaces including 11 blue badge spaces together with 4 motorcycle spaces shall be provided in the subsequent phases.
 - 2.g Hard Surfacing Materials
 - 2.fhh External Lighting

2.gi Other structures (such as play equipment and furniture)

3. Living Walls and Roofs

3.a Details of the inclusion of living walls and roofs

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

4. Details of Landscape Maintenance

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

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

5. Schedule for Implementation

6. Other

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

6.b Proposed finishing levels or contours

7 Further detail of Biodiversity Net Gain

7.a Details illustrating a biodiversity net gain across the development as a whole and submitted phase by phase shall be submitted and approved prior to above ground works in each phase.

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

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 12, DMHB 14, DMEI 1 and DMT 2 of the Hillingdon Local Plan Part 2 (2020) and Policy G5 of the London Plan (2021).

20 NONSC Play area details

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

REASON

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

21 NONSC Accessibility

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. the remaining 10% of all units shall be constructed to accord with the technical specifications of Section M4(3)(2)(b) for a Wheelchair Accessible dwelling as set out in Approved Document M to the Building Regulations 2010 (2015 edition).

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).

22 NONSC Parking Management and Allocation Plan

Prior to occupation of the any relevant phase of this development, a Parking Management and Allocation Plan shall be submitted to and approved in writing by the Local Planning Authority. It shall detail the following:

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

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

REASON

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

23 NONSC Delivery and Servicing Plan

Prior to the occupation of any relevant phase of this 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).

24 NONSC Construction Management and Logistics Plan

Prior to the commencement of any relevant phase 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 including appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction). 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).

25 NONSC Overheating Strategy

Prior to commencement of superstructure works any relevant phase of this, the final Overheating Strategy shall be submitted to and approved in writing by the Local Planning Authority. The submission shall demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- 2) minimise internal heat generation through energy efficient design;
- 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
- 4) provide passive ventilation;
- 5) provide mechanical ventilation; and
- 6) provide active cooling systems.

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

REASON

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

26 NONSC Bird Hazard Management Plan

Prior to superstructure works commencing of any relevant phase of this development, 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:

- a) 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'.
- b) 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.
- c) Details and a schedule of procedures to ensure that breeding or nesting birds are disturbed or displaced from any flat/green roofs (by licenced means) formed within the site.
- d) Means for suitably qualified personnel to access to all roof areas (including these smaller areas of biodiverse roof and the roof terraces) for both inspection and active bird control.
- e) Details of a protocol for liaison with RAF Northolt in the event that dispersal procedures are to be undertaken.

The provisions of the BHMP shall be implemented strictly in accordance with the details agreed for the life of the development and there shall be no variation without the written agreement of both the Local Planning Authority and the MOD.

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)

27 NONSC Flood Risk Assessment and Drainage Strategy

Prior to commencement (except for demolition, ground and enabling work) any relevant phase of this development (excluding demolition and site clearance), a scheme for the provision of sustainable water management in line with the approved Flood Risk Assessment and Drainage and SuDs Strategy shall be submitted to, and approved in writing by the Local Planning Authority in consultation with the Canals and River Trust. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site by providing information on:

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

System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that control water at source and provide wider biodiversity, water quality and amenity benefits. greenfield runoff rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change.

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

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

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

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

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

c) Minimise water use.

i. incorporate water saving measures and equipment.

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

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

REASON

To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1(2012), Policy DMEI 9 and DMEI 10 of the Hillingdon Local Plan Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2021); and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

28 NONSC Contamination

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

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

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

express agreement of the LPA prior to its implementation.

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

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

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

REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

29 NONSC Non-Road Mobile machinery

All Non-Road Mobile machinery (NRMM) of net power of 37kW and up to and including 560kW used during the demolition, site preparation and construction phases shall comply with the emissions standards set out in chapter 4, proposal 4.2.3.a of the London Environment Strategy. Unless it complies with the standard set out in the London Environment Strategy, no NRMM shall be onsite, at any time, whether in use or not, without the prior written consent of the LPA. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register <https://nrmm.london/>

REASON

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

30 NONSC Low Emission Strategy

Prior to superstructure works of any relevant phase of this development, a Low Emission Strategy (LES) shall be submitted to and approved in writing by the Local Planning Authority. The LES shall address but be not restricted to:

- 1) secure compliance with the current London Plan (March 2021), and associated Guidance requirements
- 2) To include in the Travel Plan a clear and effective strategy to encourage users to a) use public transport;
- b) cycle / walk to work where practicable;
- c) enter car share schemes;
- d) purchase and drive to work zero emission vehicles.

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

REASON

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

31 NONSC Secured by Design

Prior to the commencement of any superstructure works for each residential phase of development details of security measures to minimise the risk of crime and to meet the specific security needs of that phase shall be submitted for that phase and approved in writing by the Local Planning Authority, in consultation with the Metropolitan Police.

Any security measures to be implemented in compliance with this condition shall reach the standard necessary to achieve the 'Secured by Design gold' accreditation awarded by the Hillingdon Metropolitan Police Design Out Crime Officer (DOCO) on behalf of the Association of Chief Police Officers (ACPO). The approved measures shall be implemented before the development in that phase is occupied and thereafter retained.

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 and to ensure the development provides a safe and secure environment in accordance with Policy D11 of The London Plan 2021.

32 NONSC Fire Statement

A) No development of any relevant phase of this development shall proceed beyond the steel/timber/concrete superstructure (including roof structure) of any building proposed until the principles of a Fire Statement has been submitted to and approved in writing by the Local Planning Authority. The statement should detail how the development proposal will function in terms of:

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

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

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

REASON

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

33 NONSC Obscured glazing

Detailed; Phase 1 development condition:

The partitions which separate the private terraces on the first floor flats serving flats B.00.006, B.00.007, A.01.002 A.01.001, A.00.003, A.00.004, B.01.001, shall be glazed with permanently obscured glass to at least scale 4 on the Pilkington scale and be non-opening below a height of 1.8 metres taken from internal finished floor level for so long as the development remains in existence.

REASON

To prevent overlooking and safeguard the privacy of future occupiers, in accordance with Policy DMHB 11 and DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) of the Hillingdon Local Plan: Part 2 (2020).

34 NONSC Lighting

Prior to its installation details of any external lighting associated each relevant phase within the development including levels of illumination, position, design, structure, direction of illumination, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented and maintained in accordance with those details as may be approved.

In relation to Phase 4, the details of external lighting including levels of illumination, position, design, structure, direction of illumination and associated glare in shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Canal and River Trust and any external lighting should be angled downwards, and light directed into the site and it should not provide flood lighting to the canal corridor to show consideration for bats and other nocturnal species.

REASON

In order to ensure that the Local Planning Authority is satisfied with the details of the authorised development and to ensure the design of the new housing development enhances the quality of the area and the amenity of neighbouring properties in accordance with Policy DMHB 11 and DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) of the Hillingdon Local Plan: Part 2 (2020).

35 NONSC PV's & Energy Strategy Phase 1

Detailed Phase 1 condition:

Prior to occupation of the detailed phase 1 proposals the development must provide evidence that it has proceeded in accordance with the approved plans and specification illustrating a net reduction in regulated CO2 emissions of 102% and evidence of this shall be submitted for approval in writing to the Local Planning Authority.

REASON

To ensure the development achieves zero carbon in accordance with Policy SI2 of the London Plan.

36 NONSC Energy Strategy outline phases

Prior to the commencement of all phases in the outline element of the development hereby approved a detailed energy assessments shall be submitted to and approved by the London Borough of Hillingdon. The assessment shall set out the plans and

specifications for the 'be clean' and 'be green' technology solutions set out in the outline energy strategy. The details shall include type, size and location of the air source heat pumps including an appraisal of the associated noise and vibration. The scheme shall details the type and size of PV panels including their pitch and orientation. The assessment shall then ensure there is clear presentation of the reduction in carbon associated with the 'be lean', 'be clean' and 'be green' including making a clear allowance for the electricity demand of the air source heat pumps. Any carbon emissions identified shall be subject to an offsite contribution. The development must proceed in accordance with the approved plans and specification and evidence of this shall be submitted for approval in writing to the Local Planning Authority.

REASON

To ensure the development achieves zero carbon in accordance with Policy SI2 of the London Plan.

37 NONSC Energy Performance

Prior to occupation of each relevant development phase, a 'Be Seen' plan for the recording and annual reporting of the energy performance of the development shall be submitted to and approved in writing by the Local Planning Authority. The 'Be Seen' plan meet the requirements set out in Policy SI2 (A)(4) of the London Plan. The plan shall set out the methods for recording the actual carbon performance of the approved scheme in line with the approved energy assessment. The plan shall then set out how this will be reported to the Local Planning Authority on an annual basis (the 'annual report') and shall set out the mechanisms for identifying shortfalls in the agreed targets and the strategy for remedying such shortfalls.

The annual report shall then be submitted to and approved by the Local Planning Authority in accordance with the agreed 'Be Seen' plan. Where the annual report identifies shortfalls in meeting the approved target, it will also present proposals, onsite or offsite to remedy the problem. The development must be operated in accordance with the approved 'Be Seen' plan.

REASON

To ensure the development continues to achieve the approved carbon reduction targets in accordance with Policy SI2 of the London Plan.

38 NONSC Roof Plant

No plant, water tanks, water tank enclosures or other structures, that are not shown on the approved plans for the detailed phase and any subsequent plans approved under Reserved Matters Applications, shall be erected upon the roofs of the buildings hereby permitted.

REASON

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

39 NONSC CCTV

Prior to the occupation of each relevant phase of development, a scheme showing full details of the following for that phase shall be submitted to and approved in writing by the Local Planning Authority.

- (a) CCTV;
- (b) Security lighting

The development shall be implemented and maintained in accordance with the approved

details.

REASON

To ensure that the development provides a safe and inclusive environment which maximises personal safety and minimises opportunities for crime and antisocial behaviour in accordance with Policy D11 of The London Plan 2021.

40 NONSC UGF

Prior to the commencement of above ground works of each relevant phase an updated Urban Greening Factor Assessment (UGF) shall have been submitted to the local planning authority and approved in writing. The updated UGF shall use the Greater London Authority Urban Greening Factor calculator available at the time of the submission. The updated UGF shall demonstrate all efforts to exceed a score of 0.4.

REASON

To ensure urban greening is a fundamental element of the site and building design in accordance with Policy G5 of the London Plan (2021).

41 NONSC Estate Management Regime

Prior to the occupation of each relevant phase of development an Estate Management and Maintenance Plan for that Phase in which development would be located, setting out maintenance and management responsibilities for all communal play spaces, public realm, communal amenity spaces and all publicly accessible open spaces, shall be submitted to and approved in writing by the Local Planning Authority and the open spaces shall thereafter be maintained and managed in accordance with the approved details.

REASON

In order to ensure that the Local Planning Authority is satisfied with the details of the authorised development and to ensure the design of the new housing development enhances the quality of the area in accordance with Policy DMBH 11 of the Hillingdon Local Plan: Part 2 (2020).

42 NONSC Piling Method Statement

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

REASON

To ensure that the proposed works, in close proximity to underground sewerage utility infrastructure, will not adversely impact / cause failure of local underground sewerage utility infrastructure in accordance with Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Part 2 (2020)

43 NONSC Phase 4 condition

Prior to the commencement of Phase 4 works (except for demolition, ground and enabling work) full details of the public realm improvements to the canal corridor including future maintenance and management responsibilities and regimes should be submitted to and approved by the Local Planning Authority in consultation with the Canal and River

Trust as part of any reserved matters submissions for development along the canalside (Phase 4).

REASON

In order to ensure that the Local Planning Authority is satisfied with the details of the authorised development and to ensure the design of the new housing development enhances the quality of the area in accordance with Policy DMBH 11 of the Hillingdon Local Plan: Part 2 (2020).

44 NONSC Pump Lane shared surface

Prior to the occupation of Phase 1 detailed plans showing a shared use footway on the southern side of Pump Lane across the full frontage of the site shall be submitted to and approved by the Local Planning Authority.

REASON

To ensure that the Local Planning Authority is satisfied with the details of the authorised development and to ensure the design of the new housing development enhances the quality of the area in accordance with Policy DMBH 11 of the Hillingdon Local Plan: Part 2 (2020).

45 NONSC Whole Life Cycle

Prior to the occupation of each building within each relevant phase of development the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at the planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.

REASON

In the interests of sustainable development and to maximise onsite carbon dioxide savings in accordance with Policy SI2 of the London Plan.

46 NONSC Post Completion Report Whole Life Cycle

Prior to the occupation of any relevant development phase, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement shall be submitted to the GLA at:

CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.

REASON

In the interests of sustainable waste management and in order to maximise the re-use of material in accordance with Policy SI7 and D3 of the London Plan.

47 NONSC Circular Economy

Each application for reserved matters shall be accompanied by a detailed Circular Economy Statement and Operational Waste Management Strategy in line with the GLA's Circular Economy Statement Guidance, which shall be submitted to and approved in writing by the Local Planning Authority. The statement shall adhere to the principles set out in the draft Circular Economy Statement. The development shall be carried out in accordance with the details so approved.

REASON

In the interests of sustainable waste management and in order to maximise the re-use of material in accordance with Policy SI7 and D3 of the London Plan.

48 NONSC Structural Stability

Prior to the commencement of Phase 4 works further details on construction methodology, including details of all earthmoving, excavations and the design and construction of all foundations and any necessary mitigation measures shall be submitted to and approved and approved in writing by the Local Planning Authority in consultation with the Canal and River Trust.

REASON

To ensure that that the extent of any risk of such works to the stability of the cutting and any retaining structures can be properly quantified and assessed in accordance with Policy DMEI 8 of the Hillingdon Local Plan: Part 2 (2020).

49 A37 Refuse Collection Area (Residential)

Prior to the commencement of Phase 4, 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).

50 NONSC Wind mitigation measures

Each Reserved Matters application shall include a detailed assessment of the wind effects and related mitigation for that phase of development. The assessment shall include wind tunnel testing to assess the comfort and safety levels at relevant locations around and within the site. The assessment will demonstrate that all locations assessed meet appropriate safety and comfort criteria in accordance with the Lawson distress criteria (LDDC method).

REASON

In order to ensure that the Local Planning Authority is satisfied with the details of the authorised development and to ensure the design of the new housing development enhances the quality of the area in accordance with Policy DMBH 11 of the Hillingdon Local Plan: Part 2 (2020).

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to GRANT planning permission has been taken having regard to all relevant

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

2 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMAV 2	Heathrow Airport
DMAV 3	RAF Northolt
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 13	Importation of Material
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 8	Waterside Development
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMTC 1	Town Centre Development
LLP D1	(2021) London's form character and capacity for growth
LPP SD1	(2021) Opportunity Areas
LPP SD10	(2021) Strategic and local regeneration

LPP D1	(2021) London's form, character and capacity for growth
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 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 H8	(2021) Loss of existing housing and estate redevelopment
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP SI12	(2021) Flood risk management
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP T2	(2021) Healthy Streets
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
SA 23	Silverdale Road/ Western View. Hayes
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport

3 I10 Illustrative Drawings

You are reminded that the drawings submitted with the application are for illustrative purposes only and do not form part of the application for which permission is hereby granted.

4 I24A TFL Informative

In respect of the construction works and associated construction vehicle movements and temporary arrangement on the highway, the applicant/developer should contact the Council's Highways Maintenance Team. In case of construction works affecting the Transport for London Road Network and the Strategic Road Network, the applicant/developer should also contact Transport for London and comply with its requirements as set out in the Transport for London's 'Construction Guidance Document For Contractors' which can be viewed on the Council's website www.hillingdon.gov.uk/article/11417/Publications

5 I42 Canal informative 1

The applicant/developer should refer to the current "Code of Practice for Works affecting the Canal & River Trust" to ensure that any necessary consents are obtained (<https://canalrivertrust.org.uk/businessand-trade/undertaking-works-on-our-property-andour-code-of-practice>).

6 I43 Canal informative 2

The applicant/developer is advised that any encroachment or access over or on to the Trust's property requires written consent from the Canal & River Trust and they are advised to contact Bernadette McNicholas of the Canal & River Trust's Estates Team on 07920 495745 or Bernadette.mcnicholas@canalrivertrust.org.uk in order to ensure that the necessary licences or commercial agreements are obtained prior to any work being carried out on or adjacent to Trust owned land.

7 I44 Canal informative 3

The applicant is advised that any surface water discharge to the waterway will require prior consent from the Canal & River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement. Please contact Chris Lee, Regional Utilities Surveyor on chris.lee@canalrivertrust.org.uk to discuss this further.

8

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airside Operations staff. In some instances it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof. The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs. We will need to object to these proposals unless the above-mentioned condition is applied to any planning permission.

9 I60 Cranes

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

10

Nuisance from demolition and construction work is subject to control under the Control of Pollution Act 1974, the Clean Air Act 1993 and the Environmental Protection Act 1990. You should ensure that the following are complied with: (i) Demolition and construction works should only be carried out between the hours of 0800 and 1800 on Monday to Friday and between the hours of 0800 and 1300 on Saturday. No works should be carried out on Sundays, Public or Bank Holidays; (ii) All noise generated during such works should be controlled in compliance with British Standard 5228, and use "best practicable means" as

defined in section 72 of the Control of Pollution Act 1974; (iii) Measures should be taken to eliminate the release of dust, odours and other emissions caused by the works that may create a public health nuisance. Guidance on control measures is given in "The control of dust and emissions from construction and demolition: best practice guidelines", Greater London Authority, November 2006; and (iv) No bonfires that create dark smoke or cause nuisance to local residents should be allowed at any time. You are advised to consult the Council's Environmental Protection Unit to seek prior approval under Section 61 of the Control of Pollution Act 1974 if you anticipate any difficulty in carrying out the works other than within the normal working hours set out above, and by means that would minimise disturbance to adjoining premises. For further information and advice, contact the Environmental Protection Unit, 3S/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW (tel. 01895 250155).

11 I70 LBH worked applicant in a positive & proactive (Granting)

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

12 I72 Section 106 Agreement

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

13 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 as a phased development 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 within each relevant development phase (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development within each relevant phase may result in surcharges being imposed.

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

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

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The applicant/developer is advised that any future submissions of reserved matters applications for the future phases of the development shall not be constructed in any other

external material than brick for fire safety and design reasons.

3. CONSIDERATIONS

3.1 Site and Locality

The site is approximately 2.3 hectares and accommodates the Hayes Town Centre Estate which has a series of medium rise blocks of flats and maisonettes/duplexes at a height of 3-4 storeys together with a high-rise tower, Skeffington Court, of 15 storeys. The existing estate was built in the 1970's and contains 260 homes with a mix of 1, 2 and 3 bedroom units.

The western and southern parts of the estate are located within Hayes Town Centre boundary, which has a district-wide role as a focal point for convenience goods and services as well as public transport links. The site is bordered to the north by Pump Lane beyond which is four storey hotel and a residential area characterised mostly by low density traditional housing.

To the east are two storey semi-detached dwellings along Little Road, and further afield are commercial and light industrial/warehouse units. Crown Close forms the western boundary which houses a range of commercial uses, including a multi-storey car park, a public house and retail outlets. The estate is bordered to the south by the Grand Union Canal beyond which is a series of nine storey residential blocks.

Vehicular access is provided off Pump Lane via Austin Road which runs along the eastern boundary. Car parking for existing residents is provided within closed car parking areas located at the ground floor of the existing residential blocks and surface car parking in the southern part of the estate. Currently, there are estimated to be approximately 225 parking spaces on-site.

Pedestrian connections between the site and its surroundings are limited to the primary access off Pump Lane to the north, a central east-west underpass that runs through the site, and a raised east-west walkway at the southern end, along Western View. Internally within the site, pedestrian movement is north-south orientated along the boundaries and via a semi-private raised walkway which runs through the centre of the estate and is gated at both ends.

Hayes & Harlington train station is approximately 0.3 miles to the south, providing direct services to London Paddington, Heathrow Airport and Reading. It is also situated on the future Elizabeth Line route, which once operational will provide 10 services per hour facilitating direct travel to Essex and central and southeast London.

The site is situated approximately 0.4 miles north west of the A312, which connects to the A40 and the M4, both of which provide access to the M25.

There are no local or statutory listed buildings within the site. However, there are a number of heritage assets within close proximity, this includes Silverdale Road Warehouse (locally listed and formerly a chair factory built in 1907) to the east and the Old Crown Public House (Grade II listed building) to the west. Slightly further afield is Benlow Works, a four storey Grade II listed Victorian industrial building, which is located to the east of the site along Silverdale Road and the Parish Church of St Anselm, a Grade II listed building to the west, beyond Station Road.

Further to the south east and west there are two Conservation Areas, Botwell Nestles and Botwell Thorn, which sit beyond the canal.

3.2 Proposed Scheme

The proposals involve the phased demolition of the entire estate to provide new homes (affordable and private sale) The emerging proposals seek to provide up to 500 new residential dwellings along with a replacement community room, new public open space, improved pedestrian and cycle connectivity, new and improved landscaping and public realm and the realignment of Austin Road.

The proposed development will feature a series of housing blocks, including terraces of mews houses, that range in height from 2 to 12 storeys.

It is a hybrid application with Phase 1 being a detailed element of 80 new homes with the remaining 420 homes being in outline.

Detailed first phase

The first phase will deliver 80 new homes 40 of which will be Social Rent units and 40 as private market homes in a single podium building with two blocks (A & B) which forms part of the 500 unit total for the scheme as a whole. The building will vary in height and is up to 8 storeys in height fronting onto Pump Lane and will involve the partial demolition of part of the existing buildings.

The dwelling mix is set as follows:

- 1 bed - 23 homes (29%)
- 2 bed - 37 homes (46%)
- 3 bed - 16 homes (20%)
- 4 bed - 4 homes (5%)

Total - 80 homes

Outline Masterplan

The Outline element of the site, which encompasses the remainder of the site, is predicted to deliver a further 420 homes in four further phases (2, 3 4 and 5) in a series of 9 buildings (Blocks B to H) in four development zones as follows:

Development Zone 2

Blocks C & D - 81 Homes

Development Zone 3

Blocks E & F - 85 Homes

Development Zone 4

Blocks G, H, I, & J - 242 Homes

Development Zone 5

Mews houses - 12 homes

The nine buildings C to J together with a street of mews houses with varying height between 2 and 12 storeys. The tallest 12 storey element is positioned in the south east corner of the site fronting the canal which will also have buildings ranging from 8-10

storeys. To the north of these canal side buildings are three podium blocks of 6-8 storey which front onto Crown Close to the west. To the east is a linear strip of 2 storey mews houses which would be located parallel with the realigned Austin Road which would be bounded to the east by the rear gardens of the houses on Little Road.

The proposed heights of each building are as follows:

Block C - 26.4m (up to 8 storeys)
Block D - 20.4m (up to 6 storeys)
Block E - 26.4m (up to 8 storeys)
Block F - 20.4m (up to 6 storeys)
Block G - 29.9m (up to 9 storeys)
Block H - 33m (up to 10 storeys)
Block I - 39m (up to 12 storeys)
Block J - 26.8m (up to 8 storeys)
Mews Houses - 6.4m (up to 2 storeys)

The initial illustrative mix of units for the entire site is as follows:

One bedroom units - 38%
Two bedroom units - 43%
Three and four bedroom units - 19%

Car and Cycle parking

In terms of car parking provision, 113 car parking spaces are proposed as part of the regeneration of the estate, including 15 disabled bays with the potential of 5 spaces to be for future car clubs. 84 spaces are proposed on-site located at ground level beneath podium areas serving the residential blocks and 29 spaces are to be provided on-street along the site perimeter. Active electric vehicle charging infrastructure will be provided for 20% parking spaces which equates to 0.23 spaces per dwelling. These will all be delivered in the outline element of the scheme with no parking provision being brought forward as part of the detailed Phase 1.

In terms of cycle parking a total of 912 no. long-stay spaces will be provided for future and returning residents as well as 16 no. short-stay spaces for visitors. There will be 149 long stay spaces provided as part of the detailed Phase 1 plans.

3.3 Relevant Planning History

Comment on Relevant Planning History

The Council issued a Screening Letter dated 27 August 2021 ref: 76551/APP/2021/2589 confirming that using the selection criteria outlined in Schedule 3 of the Regulations that the Council did not consider that the proposals require Environmental Impact Assessment.

Other than the above, there are no other planning applications of specific relevance to the current proposal.

4. Planning Policies and Standards

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) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

UDP / LDF Designation and London Plan

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

Part 1 Policies:

PT1.BE1 (2012) Built Environment
PT1.CI1 (2012) Community Infrastructure Provision
PT1.EM4 (2012) Open Space and Informal Recreation
PT1.EM6 (2012) Flood Risk Management
PT1.EM8 (2012) Land, Water, Air and Noise
PT1.H1 (2012) Housing Growth
PT1.H2 (2012) Affordable Housing

Part 2 Policies:

DMAV 2 Heathrow Airport
DMAV 3 RAF Northolt
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 13 Importation of Material
DMEI 14 Air Quality
DMEI 2 Reducing Carbon Emissions
DMEI 7 Biodiversity Protection and Enhancement
DMEI 8 Waterside Development
DMEI 9 Management of Flood Risk
DMH 2 Housing Mix
DMH 7 Provision of Affordable Housing

DMHB 1	Heritage Assets
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DMHB 11	Design of New Development
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DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
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DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
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LPP SD10	(2021) Strategic and local regeneration
LPP D1	(2021) London's form, character and capacity for growth
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LPP D5	(2021) Inclusive design
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LPP D7	(2021) Accessible housing
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LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H8	(2021) Loss of existing housing and estate redevelopment
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP SI12	(2021) Flood risk management

LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP T2	(2021) Healthy Streets
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LPP T6.1	(2021) Residential parking
SA 23	Silverdale Road/ Western View. Hayes
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF16	NPPF 2021 - Conserving & enhancing the historic environment
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF8	NPPF 2021 - Promoting healthy and safe communities
NPPF9	NPPF 2021 - Promoting sustainable transport

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **2nd February 2022**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

The application was publicised by the posting of site notices around the application site and an advert was placed in the local newspaper. A total of over 1000 owner/occupiers of neighbouring properties as well as owner/ occupiers within the application site were directly notified by letter.

Four written responses were received (two from the same address).

The neighbour representations and objections made in respect of the proposals are as follows:

1. There are already too many flats in the area and this will exacerbate further congestion problems.
2. There are insufficient car parking spaces to cater for the number of flats proposed
3. Light impact on property on Little Road severely effected.
4. Windows overlooking into private garden areas of properties on Little Road - this invasion of a private gardens
5. Height of any building behind properties on Little Road reducing quality of life and privacy - these properties should not be double story in height at all. Definitely not anywhere near the height of the existing houses.
6. Size of the proposed development is grossly oversized/ unnecessary and overwhelming - not appropriate sized development in such a close proximity to the town centre and neighbourhood houses
7. Impact on the town and neighbouring properties is very negative due to its huge scale / quality of life very negative impact.
8. Negative Impact on property values in neighbouring areas and in particular Little Road - already with the Fairview development and now with this hideous development that is proposed
9. Living on Little Road has been impacted very negatively already with the Fairview (Pump Lane)

Development- this has reduced light on the street and now this proposed plan would impact the back of the houses and totally ruin quality of light and enjoyment from those back gardens. Very insensitive to those that have built there homes to family homes for a quality retirement home.

10. Having such a high development at both the front and back of Little Road is very inconsiderate and selfish - very depressing to see for the residents

11. The plans are very overpowering this is looking like a concrete jungle of ridiculously high rises apartments - More appropriate would be a development of quality homes rather than high rise apartments.

12. Overall huge negative impact on both the town and its residents with a develop of this size - which is grossly oversized for Hayes town and it's long standing residents.

PLANNING OFFICER COMMENT

Sunlight daylight and overshadowing issues in respect of the impact of the proposal are discussed at Section 7.08 of this report. The impact on the amenities and living conditions of the proposal are examined at Section 7.09 of this Report. The size, scale and quantum are addressed at Section 7.07 and 7.11. Congestion, traffic impact and parking issues are discussed at Section 7.10. The impact on property values is not a planning matter for consideration.

HEATHROW AIRPORT

We refer to your email dated 21/12/21, received in this office on the same day. The proposed detailed part of this hybrid application relating to Buildings A & B have been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

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

Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and loafing birds. The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the buildings. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

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

Information The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airside Operations staff. In some instances it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof. The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs. We will need to object to these proposals unless the above-mentioned condition is applied to any planning permission.

We would also make the following observation: Cranes Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore,

draw the applicants attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome.

This is explained further in Advice Note 4, Cranes and Other Construction Issues (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf>)

The proposed Outline part of this hybrid application has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below: Height Limitation on Buildings and Structures No building or structure of the development hereby permitted shall exceed 70.37m AOD.

Reason: Whilst Heathrow recognises that the existing building penetrates the Obstacle Limitation Surface. The replacement building called should not be allowed to exceed the existing elevation, as further penetration of the Obstacle Limitation Surface would not be deemed acceptable to Heathrows operation. See Advice Note 1 An Overview for further information (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-1-Aerodrome-Safeguarding-An-Overview-2016.pdf>).

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

Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and loafing birds. The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the buildings. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

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

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

in some instances it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof. The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

Submission of Landscaping Scheme

No development shall take place until full details of soft and water landscaping works have been submitted to and approved in writing by the Local Planning Authority, details must comply with Advice Note 3, Potential Bird Hazards from Amenity Landscaping & Building Design available at www.aoa.org.uk/policy-campaigns/operations-safety). These details shall include: - the species, number and spacing of trees and shrubs No subsequent alterations to the approved landscaping scheme are to take place unless submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To avoid endangering the safe movement of aircraft and the operation of Heathrow Airport through the attraction of birds and an increase in the bird hazard risk of the application site. We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observation: Cranes Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicants attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, Cranes and Other Construction Issues (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf>)

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

MINISTRY OF DEFENCE

The application site is approximately 3.48km from the centre of the airfield at RAF Northolt and occupies the statutory aerodrome height and technical and birdstrike safeguarding zones surrounding the aerodrome.

Aerodrome height and technical safeguarding zones

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

After reviewing the documents provided, I can confirm that the MOD has no concerns with regards to the proposed building heights for the development as indicated below:

Outline applications- Proposed maximum height of the buildings -70.37m.

Full planning permission for Blocks A and B comprising 80 residential units (Class C3)- Proposed maximum height of Blocks A and B- 58.5m.

However, if these heights were to change the MOD would need to be consulted.

Birdstrike safeguarding zone

Within this zone, the principal concern of the MOD is that the creation environments that might provide an attractant to those large and/or flocking bird species hazardous to aviation safety. The application site falls within the birdstrike safeguarding zone designated around RAF Northolt and the MOD would have concerns where development within the zone might result in an increase in birdstrike risk.

In respect of the outline planning permission for this application the MOD will require further details of the proposed design of the buildings, landscaping, including details of drainage for the whole site. These should be submitted at any future stages of this application.

The full planning permission element of this application comprises of two buildings referred to as blocks A & B. The proposed buildings will have flat roofs, with photovoltaic panels combined with a green roof, this has the potential to be attractive to those of large and/or, flocking birds such as large breeding/nesting gulls, as green roof systems can mimic natural cliff top nesting sites, the addition

of photovoltaic panels can provide shelter from prevailing weather conditions. Therefore, a bird hazard management plan to prevent successful breeding/nesting by large gulls on the roof spaces is required.

To address the potential of the development to create an environment attractive to those large and/or flocking bird species hazardous to aviation safety, the MOD requests that a condition requiring the submission, approval, and implementation of a Bird Hazard Management Plan (BHMP) is attached to any planning permission issued. A suggested condition wording is provided below:

No development shall take place unless or until such a time as a Bird Hazard Management Plan (BHMP) has been submitted to and approved in writing by the Local Planning Authority in consultation with the Ministry of Defence (MOD). The BHMP should provide details of monitoring, management, and mitigation measures that will be taken to ensure that hazardous bird species are deterred, disturbed and displaced from the site. The BHMP shall include, but not be limited to:

- Details and a schedule of procedures to ensure that breeding or nesting birds are disturbed or displaced from any flat/green roofs (by licenced means)formed within the site
- Means for suitably qualified personnel to access to all roof areas (including these smaller areas of biodiverse roof and the roof terraces) for both inspection and active bird control
- Details of a protocol for liaison with RAF Northolt in the event that dispersal procedures are to be undertaken.

The provisions of the BHMP shall be implemented strictly in accordance with the details agreed for the life of the development and there shall be no variation without the written agreement of both the Local Planning Authority and the MOD.

Reason.

To limit the potential of the site to attract and support populations of those bird species that may cause detriment to aviation safety.

Noise

The MOD advises that the proposed development will be exposed to noise from aircraft activities from RAF Northolt, which some residents, when living on the development, may find disturbing. Subject to the above condition being attached to any planning permission granted, the MOD maintains no safeguarding objection to the full planning aspect of this application.

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

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

PLANNING OFFICER COMMENT

Suitably worded planning conditions are recommended as part of any grant of planning permission.

HISTORIC ENGLAND

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. 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 site is not in an archaeological priority area. Although the wider area has potential for survival of prehistoric remains, this area has been quarried in the postmedieval period which is likely to have removed remains. Geoarchaeological sampling from nearby sites has not revealed any notable prehistoric remains.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters. NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

PLANNING OFFICER COMMENT

In light of the above no further comment or imposition of planning conditions are required.

NATURAL ENGLAND

Natural England has no comments to make on this application.

THAMES WATER

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission.

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

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water

will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk .

Please refer to the Wholesale; Business customers; Groundwater discharges section.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

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

PLANNING OFFICER COMMENT

Following receipt of the information and discussions with the applicant, Thames Water confirmed sufficient capacity and connections for the proposed development in relation to both foul and surface water via a letter dated February 2022. In addition, suitably worded planning conditions are recommended to be attached to any planning permission.

NATIONAL HIGHWAYS

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have undertaken a review of the Transport Assessment and other relevant planning documents as prepared on behalf of the applicant by Markides Associates. National Highways interests relate to the operation and safety of the SRN, and in the case of this proposed development, we are interested in the potential impact upon the M4 J3, particularly in view of the cumulative impact of this with other nearby large applications, including the Avondale Drive Estate. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN during construction and operation.

National Highways understands that the site is currently occupied by the existing Hayes Town Centre Estate, which is comprised principally of medium rise blocks of flats and maisonettes/duplexes, with a high-rise element known as Skeffington Court, located within the south eastern part of the site. The existing estate was built in the 1970's and contains 260 homes made up of a mix of 1, 2 and 3 bedroom units. The Site includes dedicated undercroft car parking areas, with an estimated 223 parking spaces on-site (equating to a ratio of 0.86 spaces per unit). Approximately 110 units have permits for these spaces. The proposed development is for phased demolition of the entire estate and replacement with 500 residential dwellings within housing blocks that range in height from 2 to 12 storeys, an uplift of 240 units above existing. The hybrid application comprises development of 80 units in the first phase, with three additional phases providing the remaining 420

units. The proposed development will include re-provision of 84 car parking spaces on site, with an additional 29 spaces provided through reconfiguration of the adjacent highway to increase on-street parking provision, managed via a controlled parking zone (CPZ) scheme. It is proposed that all existing residents with car parking permits (110) will be able to apply for either on-site or on-street permits, whilst the remainder of the units will be car free. If residents fail to renew their permits, these units will also become car free.

A review of existing trip generation for the site has been provided using TRICS data, including an assessment of AM and PM peak hour trips. This has been used to provide a baseline for comparison with trip generation for the proposed scheme. Existing trip generation uses TRICS data to provide overall person trip rates split between affordable and private homes, with local mode shares derived from 2011 Census data then applied to calculate the numbers of trips by differing modes of travel. These mode shares are used for the 100-110 units with existing parking permits, whilst for the remaining units they are adjusted to reduce the car driver mode share to 5%, reflecting the predominantly car free nature of the remaining units. The proposed trip generation uses the same methodology, calculating trips for an additional 240 car free units split between private and affordable tenures, and deriving the net additional trips above existing levels.

National Highways is generally in agreement with this methodology and the TRICS data reviewed appears generally robust and reliable. Overall forecasts for the development indicate a total of 44 two way private vehicle trips in the AM peak and 37 trips in the PM peak, excluding vehicle deliveries. These levels of trips are 9 and 8 trips above the respective number of AM and PM peak trip generation for the existing site use. Vehicle delivery trips are projected to be ~34 daily movements, however these trips will likely already be on the highway network. The TA also does not provide any assessment of development traffic distribution and assignment, including the proportion of trips that will reach the SRN. However in this instance, given the limited net increase in trips above existing levels, this is not considered a significant concern.

National Highways welcomes the proposed submission of a Framework Travel Plan (FTP) alongside the TA to further reduce the numbers of private vehicle trips to/from the site and to promote sustainable and active travel modes. When the full Travel Plan is produced, we would expect this to include ambitious targets for reducing private car mode share over time and a monitoring and review process to determine whether the required modal shift is taking place. A Construction Traffic Management Plan (CTMP) should also be submitted to detail the potential short/medium term impacts of construction traffic on the highway network and any additional mitigations necessary.

Although we have identified gaps in the information provided within the TA, given the limited scale of the proposed increase in private vehicle trips compared to the extant land uses on site, we are satisfied that the proposals would not materially affect the safety, reliability and/or operation of the strategic road network (SRN) (the tests set out in DfT C2/13 para 10 and MHCLG NPPF para 111).

Our recommendation of no objection is included in the NHPR attached. Please add this email as well as the attached NHPR to your planning portal as a combined response from National Highways

CANAL AND RIVER TRUST (Comment on original plans)

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The main issues relevant to the Trust as statutory consultee on this application are:

- a) The impact on the character and appearance of the waterway.
- b) The impact on the structural integrity and water quality of the canal due to the proximity of the works and drainage proposals.
- c) The impact on the biodiversity of the waterway corridor.
- d) Accessibility.
- e) Energy Efficiency.

Based on the information available our substantive response (as required by the Town & Country Planning Development Management Procedure) (England) Order 2015 (as amended)) is to advise that amendments, suitably worded conditions and a legal agreement are necessary to address these matters. Our advice and comments follow:

The impact on the character and appearance of the waterway.

The site is located to the north-east of the Grand Union canal which is within a cutting at this point. The site is at a higher ground level than the canal and therefore any development close to the southern boundary would occupy a prominent position and be clearly visible from the canal corridor.

It is acknowledged that outline consent, with all matters reserved, is sought for the majority of the site with the details submitted being for indicative purposes only. However, the Parameter Plans seek to set out the maximum building heights with up to 10/12 storeys being proposed adjacent to the canal boundary. The reasoning for additional height and prominence along the canalside, and a 'signpost' to Silverdale Road is not convincing as due to the change in level the development will still feel disjointed, even with the provision of the landscaped steps.

The development as indicated would be substantially taller than existing development in the vicinity and this would exacerbate its dominant character and appearance, particularly when viewed from the waterway.

Therefore, although some variation in height may be considered beneficial, it is felt that the 9-storey height of existing adjacent developments should be the maximum permitted along the canalside, with potential drops down to add variation. Any increased height should be located within the centre of the site, as per the current configuration with Skeffington Court. Should a 'signpost' be considered desirable, then this could be accomplished through a change in materials, colour, detailing or roofscape, without the need to increase the height and increase the imposing nature of the development on a towpath that already feels slightly forbidding due to the presence of the existing tall retaining wall.

There also seems to be little being done to address the lack of active frontages onto the canal, with Western View doing little to help matters by providing a raised level between lower street level and the towpath, effectively severing the two. The ground floor undercroft parking exacerbates the issue by providing an additional half storey above Western View which only features parking grilles. It would seem that more could be done to try and reduce this half level, which also results in the courtyard garden being visually and physically separated from the canalside route and the towing path.

A direct route could be potentially provided from Silverdale Road onto the towpath negating the need to have steps or the lift going up on to Western View and then back down again to the towpath. This would offer improved access for all and ensure the provision of a lift on an adjacent site was not relied upon as the sole method to provide accessibility to the canalside from this site where no ramp for pushchairs, wheelchairs or cyclists is currently indicated. This closer relationship might lead to greater use of the towpath and increase passive surveillance thereby resulting in less incidence of

anti-social behaviour occurring, it might also create opportunities for meaningful active frontage onto the towpath, with the improved surveillance this could create.

The exploration of the architectural expression, for the site as a whole, looks to be well considered. The detailing for the scheme will be of particular importance to its overall success and the highest quality of architectural expression for the canalside blocks should be sought. The Trust would be willing to engage further with the applicant or developer on this as the scheme evolves.

The detailed submission in relation to Phase 1 includes development that would be set back significantly from the canal boundary and therefore this element of the scheme would have little impact on the character and appearance of the waterway. However, in relation to the outline submission it should be ensured that the Parameter Plans are amended prior to determination to set a maximum of up to 9 storeys along the canalside boundary (Phase 4).

The impact on the structural integrity and water quality of the canal due to the proximity of the works and drainage proposals.

With any development close to the waterway there is the potential for adverse impacts on the infrastructure of the canal in terms of stability, drainage, pollution etc. The site directly adjoins the Grand Union canal which is within a cutting at this point and the proposed development would be at a higher ground level than the towpath.

We note that the development area adjacent to the canal is in outline only and that all matters are reserved. However, the submitted Parameter Plans show substantial development proposed in close proximity to the top of this cutting.

As you are aware, land stability is a material planning consideration and is referred to in paragraphs 174 & 183-184 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice Guidance. We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure and the public.

We appreciate that the issue of land stability can be complex and often also involves other regimes such as Building Regulations, however the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability and being satisfied that a site is suitable for its new use, taking account of ground conditions and land instability.

There are concerns with the proximity of the proposed works and potential loading of the development against a major cutting with no added strengthening infrastructure to support the additional loads. Accordingly, further details on construction methodology, including details of all earthmoving, excavations and the design and construction of all foundations and any necessary mitigation measures should be required as part of any future reserved matters submissions in order that the extent of any risk of such works to the stability of the cutting and any retaining structures can be properly quantified and assessed. This matter could be addressed by condition.

The drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways and it is important to ensure that no contaminants enter the canal from surface water drainage. The submitted FRA states that surface water is to be discharged to the closest available public sewer due to comments from the LLFA and highway authority raising concerns over a pumped discharge into the Grand Union Canal. The indication appears to be that the concerns related to flooding, though there does not seem to be any further information provided outlining the specific details of the concerns raised. Accordingly full details of the drainage strategy should be submitted and agreed, and this should include a full assessment of

the potential for SWD to the canal. This matter could be addressed by condition.

The applicant is advised that any surface water discharge to the waterway will require prior consent from the Canal & River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right where they are granted, they will usually be subject to completion of a commercial agreement.

The impact on the biodiversity of the waterway corridor.

The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The indicative layouts show all the green landscaping within the development would be towards the centre of the site, disconnected from the existing landscape strip to the back of the towpath and the important and prominent habitat within the Grand Union Canal SINC adjacent.

The scheme proposes improvements to the canalside public realm, and any future reserved matters submissions should seek to provide and enhance a green buffer of native vegetation including trees between the development and the towpath. Any proposals should also take into account any agreed or emerging proposals for adjacent sites, such as Silverdale Industrial Estate or mitigation planting in relation to the Botwell Bridge boardwalk. Any planting should be native species appropriate for this waterside setting and details provided to demonstrate that any planting would not adversely impact on the canal infrastructure.

The full details of the public realm improvements to the canal corridor including future maintenance and management responsibilities and regimes should be required as part of any reserved matters submissions for development along the canalside (Phase 4). This matter could be addressed by condition.

Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site should be avoided and details of pollution prevention measures should be provided. Works should also be carried out at appropriate times to avoid adverse impacts to nesting birds / bats etc. This could be addressed by the imposition of a condition requiring the submission of a Construction and Environmental Management Plan.

The Trust advise that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Any external lighting should be angled downwards, and light directed into the site and it should not provide flood lighting to the canal corridor to show consideration for bats and other nocturnal species. This matter could be addressed by condition.

Accessibility.

The Trust encourage the use of our waterways and towpaths for leisure, recreation and sporting activities as part of the natural health service, acting as blue gyms and supporting physical and healthy outdoor activity. The site adjoins the canal corridor which provides a free public resource for walking and cycling and provides access to green infrastructure, both of which can benefit the wellbeing of future residents.

The proposals would result in increased usage of the existing access and towpath. The Trust generally seeks to maintain its assets in a "steady state", and in the case of towpath maintenance, this is based on current usage. Where new development has the likelihood to increase usage the Trust's maintenance liabilities will also increase, and we consider that it is reasonable to request a financial contribution from developers to either cover increased maintenance costs, or to upgrade

the towpath surface to a standard which is more durable and thus able to accommodate increased usage without adding to the Trust's future maintenance costs.

The impact of additional use and benefit of the towpath to potential future occupiers is recognised in the submission with the draft heads of terms setting out the intention to secure a contribution towards improving the canal towpaths (through ongoing partnership working with Hillingdon Council on delivering the Quietway cycling and walking route through Hayes as part of the TfL-sponsored cycle route). The Canal & River Trust therefore request that further discussions take place on this matter and we would be happy to attend a virtual meeting to discuss this or any of our other comments on the scheme. I would be happy to arrange such a meeting and can be contacted at Anne.denby@canalrivertrust.org.uk.

Energy efficiency

The use of Heat Pumps utilising the thermal energy within the Grand Union canal should be considered as this is likely to provide sufficient energy to provide space heating to all 4 blocks within this development, space cooling to all these blocks and hot water. The use of Water Source Heat Pumps, housed in a single energy centre, would reduce the carbon footprint of the development by minimising the operational carbon as well as the embodied carbon in the blocks themselves that have to support ASHPs as well as solar PV panels.

The increased efficiency of WSHP v ASHP should also be noted, as should the ability to provide thermal energy to the adjacent development (71374/APP/2021/4176). It should also be noted that any investment in WSHP using thermal energy from the Grand Union canal could be utilised by the proposed District Heat Network, which would lead to an even lower carbon footprint of this particular development. The applicant / developer is advised to contact Maurice Bottomley, Canal & River Trust Business Development Manager on Maurice.bottomley@canalrivertrust.org.uk in relation to this potential and any commercial agreement that would be required.

Should planning permission be granted we request that the following informatives are appended to the decision notice:

- 1) The applicant/developer should refer to the current "Code of Practice for Works affecting the Canal & River Trust" to ensure that any necessary consents are obtained (<https://canalrivertrust.org.uk/businessand-trade/undertaking-works-on-our-property-andour-code-of-practice>).
- 2) The applicant/developer is advised that any encroachment or access over or on to the Trust's property requires written consent from the Canal & River Trust and they are advised to contact Bernadette McNicholas of the Canal & River Trust's Estates Team on 07920 495745 or Bernadette.mcnicholas@canalrivertrust.org.uk in order to ensure that the necessary licences or commercial agreements are obtained prior to any work being carried out on or adjacent to Trust owned land.
- 3) The applicant is advised that any surface water discharge to the waterway will require prior consent from the Canal & River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement. Please contact Chris Lee, Regional Utilities Surveyor on chris.lee@canalrivertrust.org.uk to discuss this further.

PLANNING OFFICER COMMENT

The size, scale and quantum of the development and its impact on the character and appearance of the area are addressed at Section 7.07 and 7.11.

Matters raised in relation to accessibility are also addressed in the aforementioned sections and a financial contribution in respect of the necessary improvements to the canal towpath have been agreed. Energy efficiency issues are covered in Section 7.16 of this report. The suggested informatives outlined above have been recommended as part of any grant of planning permission.

METROPOLITAN POLICE

I am pleased to confirm that I do NOT object to the proposal.

The site at present is poor from a security design perspective, and the proposals I believe will be a significant improvement. I have met with representative from both sites on two occasions and reviewed the sites and both sites are capable of achieving Secured By Design Gold accreditation as the general premise is strong from a crime prevention stand point.

If planning permission is granted either or both I request that the below planning condition is applied to each application:

Prior to the commencement of any superstructure works for each residential phase of development details of security measures to minimise the risk of crime and to meet the specific security needs of that phase shall be submitted for that phase and approved in writing by the Local Planning Authority, in consultation with the Metropolitan Police.

Any security measures to be implemented in compliance with this condition shall reach the standard necessary to achieve the 'Secured by Design gold' accreditation awarded by the Hillingdon Metropolitan Police Design Out Crime Officer (DOCO) on behalf of the Association of Chief Police Officers (ACPO). The approved measures shall be implemented before the development in that phase is occupied and thereafter retained.

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 and to ensure the development provides a safe and secure environment in accordance with policy D11 of The London Plan 2021.

This would ensure that all plans comply with appropriate standards prior to works starting and then also ensure that the finished site would achieve Secured By Design Gold accreditation, which would mean not only appropriate security rated products are used (such as doors, windows, gates etc) but also consideration is given to layout of the sites, ensuring they are built in such a way that reduces the opportunity for crime and disorder on these developments.

The rationale for this request is that unfortunately both these sites have long had issues with crime, in particular Austin Road, and a major reason why these estates are being replaced is owing to the endemic crime issues on the estates and both these sites being in areas with above average burglary rates.

On top of the request for the above planning condition I also request that within sites construction management plans, consideration be given to security of not just the area being constructed on but also the parts of the estates where works are yet to start and are inhabited. Both these sites have crime and anti social behaviour issues that could be worsened over the years of construction owing to likely limited investment and due to impending demolition and a likely rise in a lack of community ownership. At present the Austin Road estate is one of the worst hot spots for violent crime in all of

West London. I request that if a Design Out Crime Officer raises concerns and can justify those concerns to the planning department that the developer must follow the advice of the Design Out Crime Officer and make reasonable action to prevent crime issues related to the developments.

PLANNING OFFICER COMMENT

An appropriately worded planning condition is recommended as part of any permission.

LONDON FIRE BRIGADE

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

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and are unable to comment on the suitability of the proposals at this point. It is unclear from the information provided whether Fire Brigade access, facilities and the provision/location of hydrants demonstrate compliance with the functional Requirements of the Building Regulations, particularly in regards to B5; access and facilities for the fire service.

If there are any deviations from the guidance in ADB) vol 1 and 2: B5 Access and facilities for the fire service in relation to water provisions, then this information needs to be provided to the Water Office (water@london-fire.gov.uk) to discuss the proposed provision.

If there are any deviations to Brigade access and facilities then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provision. Once we have received this information then the LFB can provide a response on the consultation. Advice in regards to hydrants upon receipt of an appropriate site plan showing premises layout, access to it, and water supply infrastructure if available.

Any queries regarding this letter should be addressed to FSR-AdminSupport@london-fire.gov.uk. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

PLANNING OFFICER COMMENT

Following receipt of this response the applicant has responded to clarify the points raised. The LFB has been consulted and raises no further comments in relation to the proposal.

GREATER LONDON AUTHORITY

Land use principles
Housing and estate regeneration

Policy H1 sets out the requirements for boroughs to achieve the increased housing supply targets set out in Table 4.1, which identifies a ten-year housing completion target of 10,830 for Hillingdon Council. The application proposes the demolition of 260 existing homes and provision of 500 new homes (420 within the outline scheme and 80 within the detailed component). The replacement and uplift in affordable housing could be strongly supported, subject to addressing the loss of the existing housing as detailed below.

Policy H8 of the London Plan establishes that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. The Mayor is committed to ensuring the successful regeneration of London's housing estates, ensuring a fair deal for residents and that affordable housing is protected. These priorities are set out in detail

in 'Better homes for local people: The Mayor's Good Practice Guide to Estate Regeneration' (GPGER); key requirements are that estate regeneration proposals ensure no loss of affordable housing, that affordable housing is replaced with at least an equivalent amount of floorspace at equivalent rents, that full consultation takes place with existing residents, that existing tenants are rehoused in appropriate homes during construction works and offered the right to return to the estate on an equivalent basis and appropriate compensation is offered to leaseholders.

The site is allocated as site SA23 in the Hillingdon Local Plan Part 2: Site Allocations and Designations (2020). The allocation envisages:

- The provision of 400 new homes.
- Improved connectivity between Silverdale Road, Western View, Austin Road and Hayes Town Centre.
- The provision of appropriate new public open space.
- Proposals should include high quality design to fully integrate with the Grand Union Canal, ensure canal-side access and promote canal-side activity to maximise recreational potential.

Development should contribute to the enhancement of the Strategic Canal and River Corridors, in accordance with relevant policies on the Blue Ribbon Network.

The site currently comprises; 181 affordable/social rented homes, 18 housing association rented, 33 resident homeowners (leasehold) and 28 non-resident homeowners. The applicant has confirmed that Council and assured housing association tenants will have a guaranteed offer of a new home on the estate at social rent. Residents that under occupy their existing homes will be able to retain an extra bedroom whilst existing residents who currently require additional space will be provided with options to access larger units. The full details of the deal for existing residents (including leaseholders) must be provided to the Mayor in full prior to his decision making stage.

Alternatives to demolition

Paragraph 4.8.4 of the London Plan states that regardless of whether an estate regeneration project includes the demolition and replacement of affordable homes, it is important that all such schemes are delivered with existing and new residents and communities in mind. In the Good Practice Guide to Estate Regeneration (GPGER), the Mayor is clear that when considering options to deliver estate regeneration projects, boroughs, housing associations and their partners should always consider alternative options to demolition first.

The application documents set out the justification for demolition of the existing buildings and redevelopment of the estate which includes making the most efficient use of land and providing an uplift in housing numbers and quality. The principle of this is broadly supported noting that the re-provided internal and external spaces are of better quality and fit for purpose and, overall, the redevelopment would deliver a significant uplift in accommodation and positively contribute towards a more efficient use of land.

Like-for-like replacement

London Plan Policy H8, and the Mayor's Affordable Housing and Viability SPG also provide guidance on estate regeneration and makes it clear that the Mayor expects existing affordable housing to be replaced on a like-for-like basis, meaning that, for example, homes at social rent levels should be replaced with homes based on social rent levels. The application documents confirm that, the existing site comprises 199 affordable units which equates to 715 habitable rooms. These proposals would realise 51.7% affordable housing across the whole masterplan delivering a net gain of 40 affordable units (equivalent to 91 additional habitable rooms) when taking into account all affordable tenures. With respect to like-for-like replacement, the scheme would deliver 199 social rent replacement units equating to 681 habitable rooms. In real terms this is a reduction of 34 habitable rooms (which has arisen to better cater for local need). However, it is noted that replacement social

rent floorspace would generate an uplift of 2,954 sq.m. this is acceptable. It is noted that the affordable housing offer comprises 83% social rent and 17% London affordable rent. This must be robustly secured as part of any future planning permission.

Table 1: Existing vs proposed scenarios

Existing homes

Affordable/social rent 199 units, 12,177 sq.m. 715 habitable rooms

Private leasehold

61 units 4,057 sq.m. 232 habitable rooms

Proposed homes

Social Rent Replacement Homes - 199 units, 15,131 sq.m. 681 habitable rooms

London affordable rent - 40 units, 2,732 sq.m. 125 habitable rooms

Private - 261 units, 16,670 sq.m. 714 habitable rooms

Maximising additional genuinely affordable housing

As set out in the GPGER, in addition to ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible. As will be set out in the affordable housing section of this report the existing site comprises 199 affordable homes. The proposed scheme would generate an uplift of 40 new affordable homes, providing 51.7% of homes across the site as affordable. The applicant has submitted a viability assessment in line with the guidance above and Policies H4 and H8 of the London Plan which is currently being reviewed by GLA officers.

London Plan Policy H8 is clear that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as

social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. The GPGER seeks to ensure that social tenants who have to move have a full right to a property on the regenerated estate of a suitable size, at the same or similar level of rent, and with the same security of tenure.

The applicant has confirmed that the existing residents have the right to remain on the estate. The existing leaseholders will be entitled to the full market value of their property in addition to other compensation to assist with any move. The full detail of the right to return must be provided to the Mayor prior to his decision making stage. These provisions must be appropriately secured as part of any future planning permission.

Full and transparent consultation

The Mayor's Good Practice Guide to Estate Regeneration: Better Homes for Local People (GPGER) sets out principles for undertaking estate regeneration schemes and the Mayor's aspiration for full and transparent consultation and meaningful ongoing involvement with estate residents throughout the regeneration process, to ensure resident support.

However, the application is accompanied by a statement of community engagement which sets out the full consultation which has been undertaken with the existing community, which spanned 18 months and included a number of resident design consultations, the publication of a regular newsletter, a series of design workshops and follow up exhibitions. In December 2020 a booklet was issued to all residents outlining the ballot process, between April and May 2021 this ballot was held,

all eligible residents were able to vote 'yes' or 'no' to the regeneration proposals. 90% of residents participated with 79% of participants voting in favour of the redevelopment.
Social infrastructure/community

London Plan Policy S1 states that development proposals that provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs; which should be easily accessible by public transport, cycling and walking, particularly in high streets and town centres.

The existing site provides 115 sq.m. of community floorspace previously at the ground floor of Skeffington Court. The proposals include the provision of 140 sq.m. of new, purpose built community space. The uplift in both quality and quantum of community/social infrastructure floorspace is strongly supported and appropriately recognises the uplift in homes at the site and increased demand for these services. Full details of this provision, access and relocation of existing users should be provided prior to the Mayor's decision making stage and robustly secured as part of any future planning permission.

Land use principles conclusion

The principle of estate regeneration at the estate to deliver uplifts in affordable housing and community facilities is strongly supported. The scheme proposed would provide a net gain of 40 affordable housing units to the estate and re-provide 199 existing units as affordable housing.
Equalities

The Equality Act 2010 requires public authorities to have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics set out in the Equality Act 2010 are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. London Plan Objective GG1 establishes planning must support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation. London Plan Policy at D5 at paragraph 3.5.5 establishes that social factors that influence inclusion have a direct impact on well-being and are an important component in achieving more inclusive communities. Many factors that influence potential barriers to inclusion can be mitigated by ensuring the involvement of local communities in the planning policies and decisions that will affect them.

The removal of the existing housing and community space may result in potential disproportionate effects on people sharing protected characteristics, albeit, such affects are likely to be mitigated to some extent by the proposed re-provision of these facilities. The re-provision and interim arrangements must be appropriately secured as part of any future s.106 agreement. To support the assessment of equality impact the applicant must submit an equalities impact assessment, as well as full details of the strategy for re-provision of community infrastructure in advance of the Mayor's decision making stage.

Affordable housing

London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is 50% for public sector land. Policy H8 establishes that

all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.

For the detailed element of the scheme the applicant is proposing 80 new homes, 54% of these (by habitable room) are proposed to be affordable with all of this proposed as social rent replacement homes. The outline element would see the overall masterplan deliver 51% affordable housing, split 83% social rent and 17% London Affordable Rent.

The scheme is re-providing the existing social rented floorspace and providing additional affordable housing in line with London Plan Policy H8. As the scheme involves the demolition of affordable housing it will be subject to the Viability Tested Route. The GLA is currently reviewing the submitted viability statement in line with Policy H8 and will inform the applicant whether this is sufficient or whether any additional information is required. The GLA will consider whether early, mid and late reviews will be required, taking into account the mechanisms contained in the development agreement and the level of affordable housing secured at the Mayor's decision making stage. The final level of affordable housing must be robustly secured as part of any future planning permission. The affordability of any intermediate units must be in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report, including a range of income thresholds. Affordability thresholds must be secured in the section 106 agreement attached to any permission, as well as the relevant review mechanisms.

Affordability levels must be confirmed prior to the Mayor's decision making stage and appropriately secured as part of any future planning permission.

To facilitate a timely decision, the applicant is advised to engage with GLA officers as early as possible in this process to ensure the wording meets London Plan policy requirements.

Housing mix

London Plan Policy H10 states that schemes should generally consist of a range of unit sizes and sets out several factors that should be considered when determining the appropriate housing mix of a scheme, including the nature and location of a site. This policy also states that a higher proportion of one- and two-bed units may be more appropriate in locations with higher public transport access and connectivity. For the detailed element the applicant is proposing 29% of the units as 1-bedroom homes, 46% as 2-bedroom, 20% of the units will be 3-bedroom and 5% would be 4 bedroom homes all of which will be within the affordable tenures. This mix is considered suitable from a strategic perspective and appropriately prioritises family sized units within the affordable tenures. The Council must secure a suitable unit mix in line with the above for the outline element of the scheme.

Children's play space

Policy S4 of the London Plan states that development proposals should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m. per child. Play space provision should normally be provided on-site. However, off-site provision may be acceptable where it can be demonstrated that this would address the needs of the development and can be provided nearby within an accessible and safe walking distance. In these circumstances contributions to off-site provision should be secured by a section 106 agreement. Play space provision should be available to all housing tenures to promote social inclusion. The requirement should be based on the GLA Population Yield Calculator.

For the detailed component of the scheme the child yield would produce a requirement for 600 sq.m. of playspace. For the detailed component of the scheme there would be a provision of 140 sq.m. of playspace for children aged 0-4. There would also be a 248 sq.m. temporary provision which would in time be supplemented by the provision in the outline element of the scheme. The application documents confirm that the site would provide a total of 3,115 sq.m., 2,554 sq.m. of this is proposed within the outline area. The Council must secure the details and quality if the proposed playspaces as part of any future planning permission, ensure that the detailed element of the scheme makes

suitable playspace provision until such a time as the masterplan is realised and that the final provision captures the full requirement of the outline element of the scheme as part of its reserved matters.

Urban design

Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Optimising development capacity and residential density

London Plan Policy D3 encourages the optimisation of sites, having regard to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity, including transport. Policy D3 also states that the design-led optimisation of sites should consider details of form and layout, experience, and quality and character. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the design, as described in Policy D4 of the London Plan, which also states that proposals that include a tall building should be subject to a greater level of design scrutiny.

The proposals would have an indicative density of 208 units per hectare once both the detailed and outline elements of the scheme are delivered. The site sits in an urban setting, within a district town centre, and is well connected by public transport, being approximately 250 metres from Hayes & Harlington station. The scheme has been subject to design scrutiny at pre-application stage with Hillingdon and GLA officers, and public consultation. Subject to the resolution of all matters raised in this report, the proposed density is acceptable.

In line with London Plan Policy D4, the design code provides a comprehensive basis for assessing future Reserved Matters applications and should be appropriately secured.

Development layout

The masterplan has emerged to respond to the linear nature of the site whilst ensuring there are sufficient new visual and physical connections across the site particularly to the wider town centre. The proposals include the introduction of a new route east-west between Little Road, the Estate and the High Street, and a north-south route between the proposed community square and the Grand Union Canal. This is supported and responds well to the Local Plan site allocation which seeks to ensure connectivity through the site with particular reference to the wider town centre. The proposed buildings are set out in a rationale hierarchy which positions taller elements further from lower rise buildings in the surrounds. The layout is generally supported.

Scale and massing

London Plan Policy D9 states that development plans should define what is considered a tall building for specific localities (although not less than 6 storeys or 18 metres) and identify suitable locations; and identify appropriate tall building heights on maps in Development Plans (Parts A and B). Policy D9 also sets out further requirements for assessing tall buildings (Part C) including addressing visual, functional, environmental and cumulative impacts.

Paragraph 5.32 of Hillingdon Council's Local Plan Part 2 defines tall/high buildings as being "those that are substantially taller than their surroundings, causing a significant change to the skyline".

GLA officers note that several of the buildings proposed would not meet the definition of tall buildings

under the definition set out in Policy D9, consisting of only 6 storeys. However, several elements of the scheme would exceed the 6-storey height threshold with buildings proposed to range between 8-12 storeys at the tallest elements (shown below).

The detailed element of the scheme would comprise blocks A and B and would range in height between 6-8 storeys. The outline element of the scheme at blocks C-J are proposed to range in height between 6-12 storeys, Block K would comprise the mews style properties fronting Crown Close. With respect to the surrounding context in relation to tall buildings the Council has recently consented two residential led mixed-use redevelopments in close proximity to the site which would include tall buildings. The Silverdale Industrial Estate which forms part of the wider site allocation SA23 (ref. 71374/APP/2016/4027) was granted planning consent in 2019 for 122 new homes in buildings ranging between 4-9 storeys. Also in 2019 the Council approved the residential mixed-use redevelopment of the Chailey Industrial Estate which is approximately 100 metres to the east of the site. The proposals would range in height between 2-10 storeys.

Policy DMHB 10 of the Local Plan: Part 2 Development Management Policies (2020) establishes a similar approach stating that any proposal for a high building or structure will be required to respond to the local context and should be located in Uxbridge or Hayes town centres; be located in an area of high public transport accessibility and be fully accessible for all users; be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context; achieve high architectural quality; include high quality and useable private and communal amenity space; not adversely impact on the microclimate; provide positive social and economic benefits and contribute to socially balanced and inclusive communities; comply with aviation and navigation requirements and demonstrate consideration of public safety requirements.

The site is located within the Hayes Town Centre and thus would be in a location set out as potentially suitable for a tall building. GLA officers note that the height and massing of the proposals has been arrived at through collaborative discussions with the borough through the pre-application process. As such, GLA officers consider that the application would accord with the locational requirement set out in Part B of Policy D9. Notwithstanding this, an assessment of the scheme against the qualitative criteria set out in Part C of London Plan Policy D9 is still required. Accordingly, GLA officers are of the view that subject to appropriate local mitigation, a tall building may be acceptable here but work should continue to address local design concerns.

It must also be demonstrated to the satisfaction of the GLA and LPA that the visual, functional, environmental and cumulative impacts referred to above have been appropriately addressed.

The visual impact of the tower is considered to be acceptable, taking into account the applicant's Townscape and Visual Impact Assessment and noting the illustrative CGIs provides within the applicant's Design and Access Statement. As established in Figure 1 the taller elements of the scheme have been positioned in areas where the visual significance would be minimised and which would give rise to less than substantial harm to the heritage assets in the surrounds. On balance, this is considered to be acceptable given the overall public benefits associated with the development.

Environmental impacts including wind, microclimate, daylight/sunlight, glare impacts have been assessed and the proposed scheme with the associated technical reports concluding that the scheme is not considered to give rise to any unacceptable impacts (in some instances requiring mitigation). Collaborative discussions should continue with the Council to secure any appropriate local mitigation.

In summary the development includes tall buildings that satisfy the locational requirement of London Plan Policy D9. The appropriateness of tall buildings will need to be considered with regard to the extent to which all other tall building assessment criteria have been addressed, as well as the other

material considerations of the case and secured public benefits. An update will be provided at the Mayor's decision making stage.

Public realm

The proposal offers significant public realm and permeability improvements compared to the existing development. Pedestrian and cycle movement across the masterplan site is greatly improved. The creation of a community square which provides an east-west route for active modes only and allow public access

to the Grand Union Canal, and improvements along Western View, are especially welcomed. These improvements align with the TfL Healthy Streets approach.

Internal quality

London Plan Policy D6 promotes quality in new housing provision, with further standards and guidance set out in the Mayor's Housing SPG (2016) and the emerging London Plan Guidance on Housing Design Standards. Single aspect units are only acceptable by exception where it can be demonstrated that adequate passive ventilation, daylight and privacy can be achieved, avoiding overheating.

The applicant identifies that 76% of the homes would be dual aspect, and where there are single aspect units, none of these are family sized and none would be north-facing. These units would have adequate ventilation, daylight and privacy and would avoid overheating. All blocks would meet or exceed space standards. There all blocks are within the Housing SPG maximum of eight units accessed per core on each floor. All homes have access to private external amenity space and balconies. The quality of accommodation and amenity space is generally good particularly when viewed across the masterplan as a whole. The quality of accommodation is acceptable.

Architectural quality

With respect to the architectural approach, the applicant is advancing a simple yet robust material palette of varying shades of brick for the main body of the building with areas of glazing and coloured balustrades to the balconies. The scheme would have a variety of balcony styles with both inset and projecting. The buildings have developed to have unique characters whilst ensuring they are read as a single piece within the wider masterplan. The Council must secure the details of the outline element as part of a design code. The proposed material palette takes appropriate cues from the surrounding context and is generally of a high quality. The Council should secure details of external materials as part of any future planning permission.

Fire safety

In line with Policy D12 of the London Plan the application has been accompanied by a fire statement for both the detailed and outline elements, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings. The Council must appropriately secure an agreed strategy as part of any future planning permission for both the outline and detailed components of the scheme.

Inclusive access

Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). All schemes should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment. Applications also meet the requirements of paragraph 3.5.3 of London Plan Policy D5.

Policy D7 of the London Plan requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The application documents confirm that for the detailed element of the scheme 90% of the dwellings have been designed to comply with Building Regulations requirement Part M4(2), whilst the remaining 10% have been designed to comply with Building Regulations requirement Part M4(3). The Council should secure M4(2) and M4(3) requirements by condition as part of any permission for both the detailed and outline elements of the scheme.

Heritage

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and in relation to conservation areas, "special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area".

The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

London Plan Policy HC1 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. Development proposals should avoid harm and identify enhancement opportunities. This policy also applies to non-designated heritage assets.

There are 2 conservation areas located in close proximity to site which fall south of the Grand Union Canal, the Thorn EMI Conservations Area (south west) and the Nestle/ Rowntree Factory Conservation Area (south east). There are 4 Grade II listed buildings within the immediate surrounds of the site; Botwell House which is north west of the site, Benlow Works directly east of the plot and Enterprise House south west of the site and St. Anselm Church. There are several locally listed buildings in the surrounds of the site including; The Old Crown Pub, Warehouse Silverdale Road, and Hayes and Harlington Station. The applicant has provided key views from 16 locations agreed

with the Council.

Table 3: Heritage assets and assessed harm

Listed building
Botwell House
No harm

Benlow Works
No harm

Enterprise House
No harm

St. Anselm Church
Less than substantial

Low Locally listed building
The Old Crown Pub
No harm

Warehouse Silverdale Road
No harm

Hayes and Harlington Station
No harm

Conservation areas
Thorn EMI
No harm

Nestle/ Rowntree Factory Conservation Area
No Harm

The proposed scheme relates more positively with the assets listed above than the existing buildings, is more sensitively designed to reflect the proportions and plot widths of building frontages, and would make a positive contribution to the existing and emerging street character of this part of Hayes. However, as set out above there is less than substantial harm to any heritage asset. Given the separation distance which exists between the proposed development and the conservation areas, emerging context and low visibility there is no harm to either of these assets. With respect to the locally listed buildings, which fall in close proximity to the site, the proposed architecture offers an improvement to the settings of these assets and thus there is no harm. In terms of the Grade II listed assets the impact of the proposed development within the setting of the assets, there would be less than substantial harm or no harm, as in the case of Botwell House were the proposals would not be visible in townscape views. The proposed scheme introduces a distinctive, high quality architecture, which is scaled to address the established character of the area. In order to ensure that the outline element of the scheme continues to do this, the council must appropriately secure a design code which ensures the principles set out above are achieved.

Having regard to the statutory duties in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the NPPF in relation to listed buildings and heritage assets, GLA officers consider that the proposed redevelopment of the site would cause less than substantial harm to the historic significance of the assets listed in paragraph 67 of this report. The harm identified must be given considerable importance and weight and the proposals do not comply with

London Plan Policy HC1 which requires development proposals to conserve the significance of heritage assets. In accordance with the provisions of the NPPF the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

The comprehensive redevelopment of the site would make the most efficient use of land and optimise residential and non-residential uses which is supported from a strategic perspective. The proposed scheme appreciably improves the existing situation and introduces a distinctive, high quality architecture, which is scaled to address the established character of the area. The scheme would also provide 51% affordable housing.

GLA officers are of the view the proposed scheme and its public benefits could outweigh the less than substantial harm arising from the demolition of the existing building - once these have been appropriately detailed and secured. An update will be provided at the Mayor's decision making stage accordingly, following Hillingdon Council's consideration of the proposal and the receipt of a draft decision and any draft Section 106 agreement.

Transport Transport assessment

The Active Travel Zone (ATZ) assessment is thorough in its investigation of the five key routes assessed and identifies issues that must be addressed to achieve Healthy Streets-compliance. The Council must consider these recommendations and use these as the basis for negotiating an appropriate level of contribution. Additionally, highway improvements on the adopted highway adjoining the site are expected to be secured through a Section 278 Agreement.

Given the projected scale of growth in Hayes and the anticipated increase in vehicle flows through the A312 corridor (especially the Bulls Bridge junction that is currently at capacity) and consequent deterioration in conditions for all roads user, particularly for pedestrians, cyclists, and bus passengers, TfL has developed a package of measures for the A312, including a Healthy Streets Scheme for the A312 Bulls Bridge Junction. A financial contribution towards this scheme is required. The amount will be determined following clarification of the adjusted mode share and trip generation. This will need to be secured by Section 106 Agreement.

Highway impacts

With regards to the trip generation and impacts, clarification on the adjusted modal split applied in the proposed development trip generation analysis is sought. The adjusted modal split for cars (5%) does not reflect the level of parking for the proposed development and as such must be revised.

Car parking

223 car parking spaces are provided in a series of undercroft car parks across the masterplan site. This equates to 0.45 per residential unit and is in line with London Plan Policy T6. It is noted that the justification for car parking partly relies on the requirement to reprovide parking for 110 existing permit holders. However, given the site is in a well-connected location, and in view of the Mayor's aspiration for 80 per cent of trips in London to be made by sustainable transport modes by 2041, the applicant is urged to further reduce the level of car parking across the masterplan site.

An additional 45 on-street car parking spaces will be created. These spaces will be included in controlled parking zone (CPZ). This increases the car parking ratio to 0.54 per residential unit. Use of on-street parking spaces will be restricted to existing residents only. A permit-free agreement to prevent new residents from obtaining permits to parking in any CPZ bays should be secured.

Of the 19 car parking spaces provided for Blocks A and B, only 2 are for blue badge holders. London Plan Policy T6.1 requires a minimum of 3% (3 spaces) blue badge parking spaces from the outset

and 7% passive provision to meet future demand. However, it is evident that the minimum Blue Badge parking requirement can be met.

All parking should be monitored, managed and enforced through a Parking Design and Management Plan (PDMP) to be secured by legal agreement. In accordance with the London Plan 20% of spaces must have an active electric vehicle charging point and at least passive provision is required for the rest.

Cycle parking

Cycle parking accords with the London Plan Policy T5. The cycle stores for Blocks A (81 spaces) and B (68 spaces) are provided at ground level and includes adequate provision for non-standard bicycles in accordance with London Cycle Design Standards guidance. Short-stay spaces for visitors are provided in the public realm on Pump Lane. Similar cycle parking arrangements are provided for the blocks in the outline part of the application. Cycle parking should be secured by condition.

Deliveries and servicing, construction logistics and travel plan

A Construction Logistics Plan (CLP) and delivery and servicing plan will need to be secured by condition. Given the other development in the area, the CLP will need to include co-ordination arrangements to ensure management of cumulative impacts. A full Travel Plan should be secured through the Section 106 agreement.

Transport conclusion

The applicant must address issues in respect to the proposed vehicle parking, modal split and trip generation analysis. The Council must appropriately secure vehicle and cycle parking, a delivery and servicing plan, a travel plan and a construction logistics plan. A financial contribution of £335,632.20 will be sought towards Bulls Bridge junction improvements.

Sustainable development

Energy strategy

In accordance with the principles of Policy SI2 of the London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures). The detailed element of the proposals would achieve a net reduction in regulated CO₂ emissions of 102%. The applicant is achieving net zero carbon on-site; this is strongly supported and a carbon offset payment is not required. Appropriate conditions must be imposed in relation to the outline element of the proposals to make sure London Plan targets are met. The applicant should provide a commitment that the development is designed to allow future connection to a district heating network. The applicant is proposing renewable technologies, comprising photovoltaic panels. The applicant should reconsider the PV provision and provide a detailed roof layout demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV.

Whole Life-Cycle Carbon

London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

The applicant has submitted a WLC report which generally accords with the principles set out in Policy SI2. Additional information and clarification is required in respect of both the outline and

detailed elements of the proposal including with respect to emissions and material life-cycle. A full technical note has been provided to the applicant which must be responded to in full prior to the Mayor's decision making stage. The application should also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions for both elements of the scheme.

Circular Economy

Policy SI7 of the London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process.

The applicant has submitted a circular economy statement which generally accords with the principles of the policies and guidance above however more information is required before full compliance can be confirmed with particular reference to material recycling and waste processing. A full technical note has been issued to the applicant which must be responded to in full prior to the Mayor's decision making stage. Once agreed a detailed Circular Economy Statement should be secured for Reserved Matters and a post construction monitoring report should be secured for both elements of the scheme.

Urban greening

London Plan Policies G1 and G5 embed urban greening as a fundamental aspect of site and building design. Features such as street trees, green roofs, green walls, rain gardens, and hedgerows should all be considered for inclusion and the opportunity for ground level urban greening should be maximised. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.37 across the completed masterplan, this falls short of the target of 0.4. The applicant should explore additional measures to reach the specified target prior to the Mayor's decision making Stage. The Council must secure all greening measures to ensure the target is met for both elements of the scheme.

Air quality

London Plan Policy SI1 states that development proposals should not lead to further deterioration of existing poor air quality, 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 or create unacceptable risk of high levels of exposure to poor air quality. The site falls within the Hayes Air Quality Focus Area. The applicant has provided an air quality assessment which identifies that the proposed development would not require mitigation measures other than during the construction phase of the development. The Council should identify all appropriate mitigation and appropriately secure these as part of any future planning permission.

Sustainable drainage and flood risk

The submitted flood risk assessment does not comply with London Plan Policy SI12, as it does not give appropriate regard to the risk of pluvial flooding and does not include the Grand Union Canal within the assessment of flood risk. The surface water drainage strategy for the proposed development does not currently comply with London Plan Policy SI13, as insufficient information has been provided. The proposed development does not meet the requirements of London Plan Policy SI5 as no information has been provided regarding the water consumption targets for the proposed non-residential uses. The applicant should also consider water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.

Local planning authority's position

Hillingdon Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on town centres, estate regeneration, social infrastructure, housing, affordable housing, urban design, heritage, transport and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- Land use principles: The principle of estate regeneration to deliver uplifts in affordable housing and community facilities is strongly supported. The scheme proposed would provide a net gain of 40 affordable housing units to the existing estate and re-provide 199 existing units as affordable housing.
- Housing: The re-provision of affordable units and uplift of 240 new homes is strongly supported. The applicant is proposing 51% affordable housing across the masterplan. The Council must robustly secure this offer and all relevant affordability criteria. Early, mid and late stage reviews are required.
- Urban design: The design of the detailed scheme is broadly supported. The Council must appropriately secure a design code for the outline proposals.
- Transport: The applicant must address issues in respect to the proposed vehicle parking, modal split and trip generation analysis. The Council must appropriately secure vehicle and cycle parking, a delivery and servicing plan, a travel plan and a construction logistics plan. A financial contribution of £335,632.20 will be sought towards Bulls Bridge junction improvements.
- Sustainable development: Further information and clarification is required on the sustainable development strategies before compliance with the London Plan can be confirmed.

PLANNING OFFICER COMMENT

Officers have contacted TfL regarding the incorrect assessment in relation to future car parking provision and have amended their report by letter dated 28th February 2022 and now states the following:

'Of the 19 car parking spaces provided for Blocks A and B, only 2 are for blue badge holders. London Plan Policy T6.1 requires a minimum of 3 per cent (3 spaces) blue badge parking spaces from the outset and 7 per cent passive provision to meet future demand. However, it is evident that the minimum Blue Badge parking requirement can be met.'

84 car parking spaces are provided in a series of undercroft car parks across the masterplan site. This equates to 0.17 per residential units. An additional 45 on-street car parking spaces will be created. These spaces will be included in a controlled parking zone (CPZ). A total of 113 car parking (off-street + on-street) equates to 0.23 per residential unit, which is within the maximum - 0.5 space per dwelling - permitted by London Plan Policy T6. A permit-free agreement to prevent new residents from obtaining permits to parking in any CPZ bays should be secured.

All parking should be monitored, managed and enforced through a Parking Design and Management Plan (PDMP) to be secured by planning condition in accordance with the London Plan 20 per cent of spaces must have an active Electric Vehicle Charging Point (EVCP) and at least passive provision is required for the rest.

A Parking Management Plan (PMP) detailing the arrangements for all parking (car and cycle) on-site, including provisions for managing, monitoring, enforcement and review, along with arrangements for managing the internal route and for ensuring only Blue Badge holders use the car parking, should be secured by condition.'

In terms of the non transport related matters raised by the GLA, namely affordable housing, energy and sustainability these matters are discussed in further detail at Section 7.13 (affordable housing and FVA) and Section 7.16 in terms of renewable energy and sustainability.

NHS

We have used the NHS HUDU Planning Obligations Model to calculate the cost of mitigating the impact on the local health infrastructure from the residents of the additional housing units. The London Plan chapter 11 sets out the HUDU Model as the appropriate methodology for boroughs to use when assessing S106 contributions for health.

We assess the impact of the proposed development across all health infrastructure including mental health and acute facilities as well as primary care. However, I am aware of the viability issues on regeneration schemes and therefore have proposed that the contribution to mitigate the direct impact on primary care infrastructure is secured as a minimum through a Section 106 agreement with appropriate trigger points for the payment to enable the North West London CCG to ensure that additional capacity can be delivered in parallel with the new population. If viability permits, then we would ask for the other health infrastructure needed to be secured through the S106 agreement and if not for the CCG/ICS to discuss with the Council at a later date the potential for submitting a CIL proposal for the mitigation on acute and mental health infrastructure.

Hayes Town Centre

This scheme creates an additional 240 units with an estimated population of 494. The HUDU Model calculates the overall capital cost of mitigation allowing expansion across acute, mental health and primary care infrastructure to be £457,597 (2021/22 costs) which equates to an average of £1,907 per home. £161,306 of the total capital would be for primary care capacity. The NHS will need to find additional revenue in the short-term calculated as £674,027.

We do look at where the net population gain may be lower due to additional affordable housing accommodating households living together in overcrowded accommodation or where there may be other circumstances where residents may be moving into the accommodation but they do not create a net increase in the population. In this circumstance we would re-run the HUDU Model using the new population figures.

Policy Context

In addition to the NPPF and the London Plan requiring developments to contribute to the additional infrastructure required to meet their needs Hillingdon's Local Plan Parts 1 and 2 in particular Policy C1 Community Infrastructure Provision and Policy DMCI 7: Planning Obligations and Community Infrastructure Levy are relevant to these schemes.

The Council's 2017 Strategic Infrastructure Plan sets out that Hillingdon was already struggling with less and poorer quality primary care estate than its population requires. It includes the need for additional primary care infrastructure in Hayes and Harlington.

We ask that the contributions sought for primary care (£161,306) are secured through S106 agreements for expansion of capacity within the Hh Collaborative PCN in line with the IDP. A map is attached showing the Hh Collaborative PCN and its constituent practices which serve the two development sites and their communities.

PLANNING OFFICER COMMENT

Officers have carried out a review of the schemes measured against the HUDU model and a financial contribution is sought albeit at a different rate than that calculated by the NHS. This is further addressed in Section 7.22 of this Report.

Internal Consultees

LANDSCAPE TEAM

This site is occupied by Council-owned flats, with associated amenity space and parking, located to the east of Hayes Town Centre, between Crown Close (west) and Austin Road (east). The site is bounded to the north by Pump Lane and to the south by Western View and the Grand Union Canal. There are a number of trees on the estate which are not protected by TPO or Conservation Area designation, albeit the Council do not generally TPO their own trees, as guardians of these valuable assets. The landscape quality of the area is currently poor and hostile.

Background

This hybrid outline application follows the submission of pre-application ref. 76550/PRC/2021/153. The current proposal has been amended to reflect the outcome of public consultation, pre-application meetings and site visits.

Existing trees

A tree report by Middlemarch Environmental (TEP), dated February 2021, has been amended in December 2021 to reflect the evolving site layout and design. The report has identified and assessed the condition and value of 43 trees, 4 groups and 3 hedgerows, in accordance with BS5837:2012. There are no A grade trees (highest quality), 24 B grade trees (moderate /worthy of retention on development sites), 24 C grade trees/groups/hedges (lower quality) and 2 U grade (very poor). The report includes tree survey and retention plans.

Table 5.1 confirms that the Detailed Phase 1 application will require the removal of 10 trees/groups/hedges to enable the development, including 5 x B grade specimens. Table 5.2 confirms that the Outline / Phases 2-5 application will result in the loss of a further 29 trees/groups/hedgerows, including 11 x B grade specimens. The tree impacts will need to be reviewed and re-assessed as Phase 2-5 come forward.

At 5.4.2 the report confirms that the removal of hard surfacing near trees to be retained will require special safeguarding measures.

Section 6 confirms that the proposed development is likely to have a visual impact on the area, however, replacement planting as part of a comprehensive landscape scheme will provide some

mitigation.

Sections 7 and 8 highlight the need for tree protection and an arboricultural method statement which should be incorporated within a Construction Method Statement.

Landscape proposals

An illustrative landscape statement, by The Environment Partnership, provides an analysis of the existing landscape (1.1) and proposes a comprehensive landscape strategy for the whole site (1.2). A tree strategy (1.3) confirms that 26 new trees will be planted in Phase 1 by way of mitigation for those to be removed, while in Phases 2-5 over 40 trees will be planted compared to those sacrificed to the development.

Landscape proposals include the provision of play space strategy (1.6), the enhancement of routes and pedestrian links Crown Close (1.7.1) and Austin Road (1.7.2), Siverdale Road (1.7.3). The canalside enhancements, Community Square and communal gardens are described in 1.8.1- 1.9. Hard and soft landscape details are illustrated (1.10 -1.14).

Phase 1 landscape proposals are described in 2.1-2.5, parts of which will be temporary pending the re-alignment of Austin Road at a later date.

At 2.5 the biodiversity enhancements are outlined and the Urban Greening Factor calculation provided, producing a score of 3.3 - somewhat below the GLA target of 0.4.

A Landscape Management Plan, by TEP, sets out objectives, responsibility and methodology for the establishment, management and maintenance of the various landscape / habitat typologies.

RECOMMENDATION

No objection subject to RES2, pre-commencement condition RES8 (arboricultural method statement and construction management plan), RES9 (parts 1,2,3,4,5 and 6) and RES10.

HIGHWAYS

A hybrid planning application, part detailed, part outline, has been received seeking planning permission for the development of 500no. residential units and a 140 sqm community centre. The detailed first phase application comprises 80no. units within two blocks located at the northern end of the application site. The outline part of the application comprises of 420no. units to be built in phases 2, 3, 4, and 5. The proposal would provide 113no. on-plot car parking spaces and 912no. cycle parking bays. As part the development the local road network would be remodelled, this would include the provision of 29no. car parking spaces of which 9no. would be along Crown Close in an echelon parking layout. There would be a further 6no. short stay cycle parking bays for public use and 1no. long stay and 2no. short stay bays to serve the community centre. Twenty percent of all car parking spaces would be provided with active electric vehicle charge points with all the remainder having passive provision.

The existing Estate was built in the 1970's and contains 260no. homes made up of a mix of one-bed, two-bed and three-bed units. These would all be demolished and replaced by the 500no. new units, an uplift of 240no. units. The existing residents would be decanted and return once the new estate is complete.

In its existing use car parking is provided within enclosed car parking areas located at the ground floor of the existing residential blocks. These are estimated to provide 223no. parking spaces on-site (equating to 0.86 spaces per unit). In addition, there are 45no. on-street parking spaces within the area of study which equates to 1.03 spaces per unit when considered alongside the on-plot provision. To be able to park within the closed parking area residents must hold a permit, the applicant reports that approximately 110no. existing residents have these parking permits. Some

residents chose not to use the enclosed parking areas due to personal safety concerns.

The site is situated on the edge of Hayes town centre and benefits convenient access to a full range of shops, services and facilities and transport opportunities. These include nurseries, schools and Uxbridge College, a full range of healthcare facilities, public open space and Botwell Green Sports and Leisure Centre, Hayes and Harlington Elizabeth Line station, 12no. different bus services and the Grand Union Canal Cycle Quietway.

The site is border by Pump Lane to the north which connects the A312 Parkway to the east with Coldharbour Lane to the west. Pump Lane also provides access to the Southall Green Quarter which when built out will provide a mixed-use development with 3,750no. units. Pump Lane has street lighting, footways on either side of the carriageway and parking restrictions. There is an aspiration to widen the footways to provide a shared use facility for cyclists and pedestrians. When complete this route would link Southall railway station in the east with Hayes town centre in the west.

The southern boundary is formed by the Grand Union Canal, the canal towpath is being improved to Transport for London Cycle Quietway standard. Crown Close form the western boundary, on its western side, Crown Close provides access to the rear of shops and business fronting onto Station Road and a shoppers car park. On the eastern side are the back gardens of the properties that would be demolished. The northern end of Crown Close operates two-way working to allow vehicles to gain access to the delivery bays and car parks, beyond these to the south Crown Close operates one-way southbound only, there is also a 7.5t weight restriction. A vehicle cannot therefore enter Crown Close from the south. There is a zebra crossing at the northern end of Crown Close, just back from Pump Lane. The eastern site boundary is formed by Austin Road, on the western side Austin Road provides access to the car parks of the properties that would be demolished and on the eastern side are the back gardens of the house fronting onto Little Road - the "next street along". Austin Road is a no through road with parking bays on its eastern side, these parking bays are form part of the HY1 parking management scheme where parking is restricted to permit holders only Monday to Saturday 09:00 to 17:00h. At the far end of Austin Road is a 4no. space car park, from this point vehicle access is restricted though pedestrians and cyclist can reach Silverdale Road and Little Road, by walking through the estate, they can reach Crown Close and on-wards to Hayes town centre. Along both Crown Close and Austin Road the existing development is inward facing. To facilitate the development Austin Road would be stopped up with the land being taken by the new development.

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

According to the Transport for London WebCAT service the application site has a PTAL ranking of 4 bordering 5 indicating access to public transport is good compared to London as a whole suggesting that there are opportunities for some trips to be made to and from the site by modes other than the private car.

A mentioned above Austin Road would be stopped up to facilitate the development. As a result, the pedestrian and cyclist access from Austin Road to Silverdale Road and through the estate to Crown Close would be lost. This is not considered critical as alternative routes would be provided as part of the new development. For Austin Road to be stopped up would require a formal Stopping Up Order, the Highway Authority require the developer to pay to the full legal cost of making this Order. This should be secure via a s.106 legal agreement of the 1990 Town and Country Planning Act. In addition to Austin Road, localised areas of footway along Crown Close would also need to be stopped up. The Highways Delivery Team have been consulted upon this proposal and have no objections in principle.

The applicant is also proposing that the Council adopts some of the new roads created by the development.

As mentioned above a total of 113no. car parking spaces are proposed as part of the regeneration of the Estate, of these 15no. would be disabled persons parking and 5no. car club bays. Eighty-four spaces are proposed on-plot at ground level beneath podium areas serving the residential blocks. As part of the remodelling of the road network around the site a further 29no. spaces are to be provided on-street. The majority of the 113no. car parking spaces would be allocated to returning residents that previously held a permit to park in one of the demolished enclosed parking areas.

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan (2021) Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards. This requires that developments in a PTAL zone 5 are car free and developments in PTAL zone 4 provide a maximum of between 0.5 and 0.75 spaces per dwelling. As mentioned above the site straddles a PTAL zone 5 and a PTAL zone 4. Taking this into account the lower maximum car parking ratio of 0.5 spaces is to be used. For the detailed and outline applications combined the published London Plan 2021 would allow a maximum of 250no. car parking spaces to be provided. The 113no. proposed is therefore in accordance with Policy T6.1. The Highway Authority does not accept that the 29no. on-street parking spaces can be considered part of the development. Subject to other considerations these spaces would be ideally subsumed within the wider HY1 parking management scheme, the occupiers of the new development could apply for a permit to park in one of these spaces, however these spaces would be available for all HY1 permit holders to use, not just the occupiers of the new development. Including these new spaces as part of HY1 would require the Traffic Order to be changed, for this to take place the developer would be required to enter a s.106 agreement of the 1990 Town and Country Planning Act obliging them to fund the making of this Order.

The London Plan Policy T6 Car Parking requires that 20% of car parking in new development should be provided with infrastructure for electric or other Ultra-Low emission vehicles. As mentioned above this requirement would be met.

The London Plan requires that developers provide a minimum of 3% of units with disabled parking increasing to 10% in response to demand. The 15no. disabled parking spaces proposed is therefore policy compliant.

The London Plan Policy T5 Cycling requires that depending on the size of the dwelling measured by number of bedrooms, between 1no. and 2no. long stay cycle parking bays are provided. Though the size of all c.500no. dwellings is not yet known, the 912no. cycle parking bays proposed is policy compliant and sufficient.

To determine the impact the development would have on surrounding transport network the applicant has calculated trip generation both with the site in its existing use and the proposed use and then highlighted any changes. To determine the likely trip generation for the site, the industry standard TRICS database has been reviewed to obtain trip rates that are representative of the proposed development in terms of location, accessibility and parking provision. The applicant has also taken into account there are differences in the person trip rates between the occupiers of affordable housing and the private housing. To forecast the likely modal split the applicant has referred to the Method of Travel to Work data for this location contained 2011 Census, this then been used to proportion these 'Total Person' trips to different modes of travel. As the existing car parking permit holders would have their permit provided when the development is built out it has been assumed that for these residents their modal split would remain unchanged. To reflect for the car-free nature of the units that will be occupied by new residents, the modal splits have been manually adjusted to reappportion the car driver trips across the other modes and reduce the car driver proportion to 5%.

The site in its current use generates 6no. private car arrivals and 29no. departures in the AM Peak, 34no. movements in total. With the development built out, the development would generate 7no. private car arrivals and 36no. departures in the AM Peak, 44no. movements in total, this represents a net increase of 9no. car trips which is less than the daily fluctuations in traffic volumes and is considered insignificant, these additional private car trips could easily be absorbed by the local road network.

However, the site in its existing use generates more bus, minibus or coach trips than the private car, in the AM Peak, 10no. arrivals, 48no. departures, 58no. movements in total. Bus, minibus and coach travel continues to be the primary mode for trip making with the development built out rising to 17no. arrivals, 92no. departures, 109no. movements in total. This represents a net increase of 52no. movements.

As this is a hybrid application, the Highway Authority is only able to provide comments on the detailed Phase 1 part of the application. As mentioned above Phase 1 is located at the northern edge of the site, consisting of two blocks, Block A fronting Pump Lane and Austin Road, and Block B fronting Crown Close and a proposed side street that will connect Austin Road and Crown Close to the south of the blocks. The blocks are built around a ground floor parking area above which there is a podium with a communal garden.

The proposed building footprint of the new development would extend west beyond the existing built form, closer to the Crown Close carriageway. In response, and as part of both the Detailed First Phase and subsequent phases that form part of the Outline Area, it is proposed to narrow Crown Close from its existing width of approximately 7m down to 6.3m immediately south of Pump Lane to the Phase 1 car park access, then reducing further to a width of approximately 5.5m south of the car park access, with two-way access maintained through this section.

At the junction with Pump Lane, junction radii of 6m are maintained on the entry radius.

On the western side of the carriageway the existing kerb line is maintained. To accommodate the Phase 1 car park access, the existing offset zebra crossing on Crown Close is to be removed. As a result of the carriageway narrowing, the crossing distance within the Crown Close bell mouth is reduced to approximately 8m along the natural desire line that follows Pump Lane. As such, and given the lightly trafficked nature of Crown Close, the zebra crossing is to be replaced with an informal crossing along this natural desire line. To carry out the above works the applicant would need to enter a s.106 agreement of the 1990 Town and Country Planning Act with the Council that obliges the applicant to enter a s.278 agreement of the Highways Act 1980 (as amended).

As mentioned above the Grand Union Canal Cycle Quietway forms the southern boundary of the site. At the far southern end of Austin Road would be a flight of steps leading to the Grand Union Canal. The Highway Authority requires that this flight of steps includes a wheeling channel for cyclists, this would allow riders to wheel their bicycles to the canal as opposed to carrying them.

The Highway Authority is concerned that cars reversing out of the echelon chevron parking spaces will present a risk to road safety should they and another vehicle travelling southbound along Crown Close fail to notice one another resulting in a collision. To help reduce the risk of this happening and the severity of the outcome if it does the Highway Authority requires that the traffic calming measures are provided along Crown Close just before the start of the echelon parking, this could be achieved by installing a speed table of narrowing the carriageway width.

The Highway Authority has reviewed the Travel Plan submitted alongside the planning application and requires that the Plan is amended to include the following.

- As part of soft measures, the Travel Plan Coordinator must directly engage with residents as soon as the first unit is occupied.
- The Travel Plan Coordinator must form a working group by engaging with organisations such as

Sustrans or LB Hillingdon itself to explore new ideas and promote sustainable travel at the site. Just providing information online or welcome packs may not help to achieve targets.

- The targets must be agreed by the time the first unit in Phase 1 is occupied - not when half the units are occupied, this is because residents moving into the development may from the outset become reliant on the private for trip making, changing travel behaviour to active travel is more challenging once travel habits have been formed. These targets should be based on the Mayors Transport Strategy.
- The travel plan must show targets for years 1, 3 and 5.

Travel Plan must be revised to incorporate the above points for the condition to be discharged.

The Highway Authority has reviewed the document titled 'Construction Logistics Plan' for 'Hayes Town Centre Estate' submitted alongside the planning application and requires that the Plan is amended to include the following.

- All Heavy Goods Vehicles shall comply with the Direct Vision Standard. A rating of 3 stars (or more) will be required. The Direct Vision Standard came into force on 1st March 2021 and forms part of the Safety Permit for all HGVs entering London (an area bounded by the M25 Motorway). It is the haulier's responsibility to comply with these regulations prior to entering the Enforcement Zone. Enforcement operates 7 days a week, 24 hours a day.
- Freight Operators Recognition Scheme (FORS) Silver standard is to be mandated by all freight operators delivering to this site to support this development.
- All deliveries, particularly Heavy Goods Vehicles, to site shall be made using vehicles which have a Class VI mirror fitted in accordance with EU directive 2007/38/EC. This is to ensure improved fields of vision across the front of the vehicles.
- The equipment must comply with at least BS-7580-2 1997 Type 2 specification, as required by BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open Sites 2 Part I: Noise. Annex G.
- Where the operational risk levels illustrated within The Control of Noise at Work Regulations 2005 could be exceeded, the precautions set out to eliminate or reduce noise levels are to be implemented. Details of maximum exposure times are to be conveyed to the relevant Site Personnel and strictly adhered to.
- The site must comply and follow the published guidance by The Institute of Air Quality Management (IAQM) on how to assess impacts of emissions of dust from demolition and construction sites.
- The plan must mention if any joint use of consolidation centres are used to deliver to the site or collaborating with other site or suppliers to reduce construction traffic in the borough. The site must reduce waste by reusing material on site where possible and follow smart procurement.
- The Construction Logistics Plan must ensure construction deliveries are always received outside peak hours.
- Contact details of site person in charge during and out of hours must be provided.
- All vehicles shall have their engines switched off while not in use to avoid idling and any vehicles carrying waste and dusty materials will be adequately sheeted or covered.
- In accordance with Transport for London guidance the applicant has provided an Active Travel Zone assessment for the site. This involves mapping all key destinations around the site such as bus stops, railway stations, town centres, parks, schools/colleges, hospitals/doctors and place of worship and then assessing the routes to them against the ten Healthy Street indicators. The ATZ should then identify locations where the Healthy Streets indicators are not met and suggest ways that this could be overcome.
- The Highway Authority has reviewed the ATZ provided by the applicant and carried out a high-level assessment of its own, this has identified further locations where Healthy Streets indicators have not been met and the works necessary for these to be overcome. The outcome of this work is provided in the table below.
- The Highway Authority require that the applicant enter a s.106 legal agreement of the 1990 Town and Country Planning Act that commits the developer to delivering the improvements identified. This is a requirement of the published London Plan 2021 Policy T2 Healthy Streets that requires that development proposals should "demonstrate how they will deliver improvements that support the ten

Healthy Streets indicators in line with Transport for London guidance".

Hayes Town Centre Estate s.106 ATZ Works

Tactile paving at the junction of Botwell Lane and Church Road roundabout. Introducing a footway with tactile paving on the area currently provided with cobblestones and brick paving along Botwell Lane at the junction of Neild Road and Golden Crescent. (Recommended by the developer in the TA) Provide dropped kerbs and tactile paving further north along Station Road / Approach and on the island separating Station Approach from Station Road south of the roundabout so that the island can be used as a pedestrian refuge. (Recommended by the developer in the TA)

Tactile paving at the junction of Halsway and Minet Drive
Tactile paving at the junction of Showers Way and Minet Drive
Tactile paving at the junction of Minet Gardens and Minet Drive
Tactile paving at the junction of Hunters Grove and Minet Drive
Tactile paving at the junction of Silverdale Road and Little Road

CCTV

Introduce CCTV camera on East Avenue (Recommended by the developer in the TA)

Cycle Lane Surface

Consider introducing different surface colour on Coldharbour Lane roundabout cycle lane (Recommended by the developer in the TA)

Planting at Footway Level

Clearing existing vegetation to the south of the carriageway on Minet Drive and introducing plants and flowers.(Recommended by the developer in the TA)

Street Furniture & Trees

Supply & install new bench (Hillingdon Bench) at various locations

Supply & install Bins at various locations

Install new tree pit & tree at various locations

Pump Lane shared use footway

Provision of a 3m wide shared use footway where the site fronts onto Pump Lane

Total cost is considered to be £119,846.

Conditions

- The Highway Authority require a planning condition obliging the applicant to submit for approval plans showing the layout of a cycle parking area able to accommodate 912no. bicycles.
- The Highway Authority require a planning condition obliging the applicant to submit for approval plans showing the layout of a motorcycle parking area able to accommodate 4no. motorcycles.
- The Highway Authority require a planning condition obliging the applicant to provide active electric vehicle charging points at 20% of all parking spaces with all the remainder having passive provision.
- The Highway Authority require a planning condition obliging the applicant to submit a car parking management for approval.
- The Highway Authority require a planning condition obliging the applicant to lease car parking spaces as opposed to selling them.
- The Highway Authority require a planning condition obliging the applicant to submit a Construction Logistics Plan for approval.
- The Highway Authority require a planning condition obliging the applicant to submit a Service and Delivery Plan for approval.
- The Highway Authority require a planning condition obliging the applicant to submit a revised Travel Plan approval.
- The Highway Authority requires a planning condition obliging the applicant to submit plans showing a shared use footway on the southern side of Pump Lane across the full frontage of the site.

Heads of Terms

- The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act that obliges the applicant to enter a s.278 agreement of the Highways Act 1980 (as amended) thereby allowing the works to the highway described above to be carried out.

- The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act that obliges the applicant to fund the changes that would need to be made to the HY1 Parking Management Scheme Traffic Order.

The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act that obliges the applicant to fund the full cost of Stopping Up Austin Road.

Subject to all of the above there are no highway objections to this development.

PLANNING OFFICER COMMENT

Officers and the applicant have been in further dialogue regarding the future provision of car parking across the application proposals in relation to both on street (along the newly aligned Austin Road, Crown Close within the new street network and those located beneath the proposed buildings. In particular the chevron parking along Crown Close chase now been changed to be parallel with the road and hence now addresses the concerns of the Highways Authority. In terms of the other matters these are discussed in further detail in Section 7.10 of this Report.

PLANNING POLICY

Principle of Development

The proposed development makes up Site C of the SA23 Site Allocation in the Local Plan Part 2 (2020). The Plan allocates the site for 400 residential units together with improvements to connectivity with the town centre, a new public open space, integration with and activity on the canal side, and enhancement of the strategic canal corridor and some active frontages at the ground floor level.

Consequently, the principle of the site's redevelopment for higher density housing is accepted. Critical matters for further consideration are the type of housing provided and the provision of public/private amenity space.

PROPOSED HOUSING

Loss of Existing Housing and Estate Regeneration

Policy H8 of the London plans requires that existing housing be replaced by new housing at existing or higher densities and at least the equivalent overall floor space. Furthermore, where this includes the loss of affordable housing, alternatives to demolition should be considered. Where demolition of affordable housing occurs as part of an estate redevelopment programme, it must be replaced by an equivalent amount of affordable housing floorspace. Social rent housing must also be provided where facilitating a right of return. Otherwise, it can be provided as social rent or London Affordable Rent (LAR). All proposals involving the redevelopment of affordable housing are also required to follow the FVA route and seek to provide an uplift in affordable housing and replace existing affordable housing floorspace.

The proposed outline will provide 19,923m² of affordable housing floorspace. This represents an uplift of 64% on the existing affordable floor space of 12,177m².

The total number of affordable homes proposed is 269 representing an uplift of 70 units, with a 40 unit uplift in the number of affordable rented homes. This will deliver a total affordable housing

provision of 51.7% by floor space, 53% by habitable rooms and 47.8% by dwellings. However, the level of affordable housing proposed cannot be confirmed as the maximum reasonable amount until a full financial viability appraisal has been assessed.

HOUSING SIZE MIX

The Planning Statement outlines that the indicative cumulative mix across the illustrative masterplan provides for 36% one-bedroom units (155), 45% two-bedroom units (190), 17% (16) three-bedroom units and 2% (4) four-bedroom units.

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

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

In terms of factors specific to a site, Policy H10 covers the mix of uses in the scheme, the range of tenures in the scheme and the nature and location of the site, with a higher proportion of one and two-bed units generally more appropriate in areas which are closer to a town centre or station or with increased public transport access and connectivity. The proposal is contrary to Policy DMH 2 in that it does not reflect the latest information on housing needs. Regarding the site-specific factors that may allow such a contradiction, the site is located within Hayes town centre. It has a PTAL of 4 to 5, suggesting a good/ very good level of public transport accessibility. It is also noted that the housing mix is driven by the housing needs generated by the existing estate and the need to make provision for those residents seeking to return. Given these specific circumstances, a lower proportion of family units is considered acceptable on this site. However, further reserved matters should aim to deliver at the top of the illustrative ranges, and these ranges should be secured through outline permission.

Tall Buildings

The proposed development includes tall buildings under the definitions in London Plan Policy D9 and DMH10 of the Local Plan. LPP2 policy DMHB 10 identifies Uxbridge and Hayes town centres as suitable for tall buildings. The site is within Hayes town centre, making it a location where tall buildings are accepted in principle subject to other design and amenity considerations. Evidence should be provided to allow for a full assessment of the impacts of the tall buildings in accordance with the criteria in DMHB10 and D9.

Open Space

Under LPP2 policy DMCI 4, new major developments must provide new public open space or enhancements to existing open spaces. Developments that fail to make such provisions will be resisted. The illustrative master plan provides 4,748m² of public open space, public realm and landscaping. This equates to 19% of the site and includes a new public open space in the form of a Community square, pedestrianised streets, canal-side public realm improvements and other landscaped areas. The Community Square will provide 842m². Continued public access to this open space should be secured through a future legal agreement.

It is noted that the Detailed First Phase will also include 447m² of public realm together with a further 675m² of temporary public realm. This will provide playable space for residents occupying the phase, given that much of the permanent open space will not be delivered until later phases.

The site is also required to achieve a minimum urban greening factor of 0.4 as required by London Plan G5. The illustrative master plan indicates a current score of 0.37. This is contrary to policy. This is a large site with limited constraints adjacent to the Grand Union Canal. Consequently, further justification as to why the master plan is not required to meet the 0.4 target.

Playspace

The quantum of play space proposed is below the policy requirements, as shown in the table below.

Consequently, there is a reliance on existing off-site provision to meet needs. Consideration should be given to the need to secure funding to support the improvement or expansion of these facilities due to the additional demand generated through the development proposal. A play strategy should also be provided to support the illustrative master plan. Such obligations should be secured through a legal agreement or condition as appropriate.

Canal Side

Site Allocation policy SA23 puts a clear emphasis on improving the canal side. Policy DMEI 8 Waterside Development further supports this. This requires canal-side developments to enhance the waterside environment and biodiversity by demonstrating high design quality that respects the waterway's character and provides access and improved amenity to the waterfront. All development alongside the Grand Union Canal is specifically expected to contribute to the improvement of the canal.

It is considered that the design and layout of the current proposals do not result in any significant improvements to the canal frontage, and this remains a weakness of the proposed scheme. No changes appeared to have been made due to the same feedback at the pre-application stage.

The retention of the existing roadway and a failure to make any changes, improve linkages with the canal-side or improve the public realm is not considered to provide a development of sufficient design quality. The existing proposals should be revisited to consider how they can better meet the requirements of policies SA23, DMEI 8 and London Plan policy SI 16. This should include improvements to the provision of public open space, exploring opportunities to address the canal side changes in level, and enhancing biodiversity.

Private Amenity Space

The total amount of private amenity space proposed is 7,522m². The Local Plan standards would require the provision of 12,085m², with the scheme only achieving 62% of the total requirement. The minimum requirements in London Plan policy D6 would require 2,822m².

Therefore, the amenity provision is low in relation to local standards but significantly above the minimums in the London Plan. Given this policy conflict, it will be essential to consider the overall quality of the private amenity space and whether it provides usable and accessible space for residents. It would also be helpful to understand how the provision between the current and the proposed schemes compare. The proposed scheme likely offers an uplift on existing provision, but evidence to support this would help balance the identified policy conflict.

Parking

A total of 113 parking spaces are proposed as part of the estate's regeneration. Most of these spaces (110) will be allocated to returning residents. This equates to a parking ratio of 0.23 spaces per residential unit. This is below the London Plan maximum parking standards for a site in this location 0.5-0.75 spaces per unit.

It is noted that the site is well served by public transport (PTAL 4-5) and is in a town centre location, making the site accessible by a range of transport modes which supports the provision of a lower parking ratio. The provision of parking on site will be managed via a permit scheme, and new residents will be subject to a parking free restriction which will need to be secured by an appropriate legal agreement.

ENERGY TEAM

I have no objections to the proposed development based on the information provided.

The energy strategy concludes that the development would achieve zero carbon standards which is supported in principle but the information to support this conclusion is limited. Consequently:

- 1) further detailed information on (a) the specific size and type of technology, location of air source heat pumps; and (b) type, location and specification of photovoltaic panels is required.
- 2) It will also be necessary to secure a clause in a subsequent S106 agreement that allows for any offsite contribution should the detailed scheme not replicate the findings in the outline strategy.
- 3) There is also a require to ensure that there is a reporting scheme to the Council for the first 5 years from occupation.

Condition

Prior to above ground works, a detailed energy assessment shall be submitted to and approved by the London Borough of Hillingdon. The assessment shall set out the plans and specifications for the 'be clean' and 'be green' technology solutions set out in the outline energy strategy (Berrylands, 25/11/21). The details shall include type, size and location of the air source heat pumps including an appraisal of the associated noise and vibration. The scheme shall details the type and size of PV panels including their pitch and orientation. The assessment shall then ensure there is a clear presentation of the reduction in carbon associated with the 'be lean', 'be clean' and 'be green' including making a clear allowance for the electricity demand of the air source heat pumps. Any carbon emissions identified shall be subject to an offsite contribution. The development must proceed in accordance with the approved plans and specification.

Reason

To ensure the development achieves zero carbon in accordance with policy SI2 of the London Plan.

Condition

Prior to occupation of the development, a 'Be Seen' plan for the recording and annual reporting of the energy performance of the development shall be submitted to and approved in writing by the Local Planning Authority. The 'Be Seen' plan meet the requirements set out in Policy SI2 (A)(4) of the London Plan. The plan shall set out the methods for recording the actual carbon performance of the approved scheme in line with the approved energy assessment. The plan shall then set out how this will be reported to the Local Planning Authority on an annual basis (the 'annual report') and shall set out the mechanisms for identifying shortfalls in the agreed targets and the strategy for remedying such shortfalls.

The annual report shall then be submitted to and approved by the Local Planning Authority in accordance with the agreed 'Be Seen' plan. Where the annual report identifies shortfalls in meeting the approved target, it will also present proposals, onsite or offsite to remedy the problem. The development must be operated in accordance with the approved 'Be Seen' plan.

Reason

To ensure the development continues to achieve the approved carbon reduction targets in accordance with Policy SI2 of the London Plan.

Section 106 - please use the standard 'carbon offset' clause in order to capture any offsite contributions that may be required as a consequence of the detailed strategy.

ECOLOGY TEAM

I have no objections to the findings of the ecology report. There is no need for a separate ecology enhancement condition although the landscape condition must reflect the requirement to achieve a biodiversity net gain. Details to be submitted prior to above ground works.

FLOOD AND DRAINAGE TEAM

The applicants have submitted a drainage strategy produced by Whitby Wood dated 29th Nov 2021. For the site of 2.38ha a greenfield run off rate of 9.9ls has been proposed a rate per of 4.15l/s/ha. A 1275m³ - 1682m³ of attenuation required. Through preapp discussion the proposal has evolved and removed the need for pumps within the site reducing maintenance requirements. The proposal is to restrict run off for the 2.38 ha site to 9.9 ls.

The drainage strategy includes: Below ground attenuation tanks; Filter drains; Rain gardens; and Green roofs. I would encourage that the parking spaces were also made permeable as detailed design is evolved and reserve matters come forward. Water consumption is limited to 105l. It is not clear the proportion of the site that currently goes to two different outfalls and if that catchment area is distributed to them through the provision of calculations to determine the storage provide is appropriate. A suitable drainage condition would be required to secure the implementation of an appropriate sustainable scheme.

ACCESSIBILITY OFFICER (Final comments)

The access officer was involved in various stages of development of the proposals, he provided a final set of recommended conditions which are copied below. An officer comment explains which conditions are/are not imposed on the final grant of consent.

Outline planning permission (with all matters reserved) is sought for the erection of new buildings, including a community centre, amenity space, open space, and 113 parking spaces to support Phase 1 for 80 residential units within two blocks (A & B) of between two and twelve storeys. A development of this size and scale is subject to compliance with London Plan policy D1, D5, D7, D12, S4 and T6.1:

1. A convenient drop off point for door to door transport services such as Dial a Ride, taxis, and hospital transport is required. No details have been submitted. The following condition is recommended:

Prior to commencement, details of a convenient drop off point in compliance with BS 8300:2018, for door to door transport providers, to include Dial a Ride, hospital transport, and taxi vehicles, shall be submitted to and approved in writing by the Local Planning Authority

Reason: To ensure the development achieves a high standard of inclusive design in accordance with London Plan policy D5 to facilitate convenient use of door to door transport services.

2. An accessible parking bay should be allocated to every M4(3) wheelchair accessible/adaptable unit. Only two accessible parking bays appear to be shown on plan.

All Wheelchair Accessible Standard M4(3)(2)(b) 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, all of 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.

3. 10% of this redevelopment would need to meet the standards for M4(3) Category 3 - wheelchair user dwelling. The affordable units should be suitable for 'day one occupation' by a wheelchair user. These units should be designed and fitted as per the prescribed standards for a Wheelchair Accessible M4(3) unit, as set out in ADM 2015.

The Phase 1(A) development hereby approved shall ensure that eight residential units on the ground floor 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 ensure an appropriate standard of housing, in accordance with policy D7 of the 2021 London Plan.

4. All remaining units must be designed to the standards for Category 2 M4(2) Accessible and Adaptable dwellings, as set out in Approved Document M 2015. Details are required to include transfer zones and all other spatial requirements within the living area, bedrooms, bathrooms, kitchen and circulation areas. 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.

5. Irrespective of the 18 m requirement for a firefighting lift, London Plan policy D5 and D12 require all new developments to provide safe, dependable and dignified means of escape for all building users, including wheelchair users and others unable to escape by stair. Accordingly, at least one lift per stair core should be capable of being used as an evacuation lift in compliance with BS EN 81-76, BS 9991 and/or BS 9999. It is no longer acceptable to apply a stay put policy for new developments.

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. The required evacuation lift shall serve all floors and remain in place for the life of the development.

REASON: To ensure the development provides reliable, convenient and dignified means of escape for all building uses in accordance with London Plan policy D5 and D12.

6. Details should be required on the accessible play equipment for disabled children, including those with a sensory impairment, or complex multiple disabilities. Provisions could include outdoor sound tubes, colour and lighting canopies, and other play equipment that could stimulate the olfactory

senses. Inclusive play is a key requirement of any new residential development.

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.

PLANNING OFFICER COMMENT

Conditions are imposed regarding dial a ride, sensory play, M4 (2) category 2 and category 3 units. The fire safety condition suggested above is not imposed as there is a specific fire safety condition and this would have precedence (It should be stressed that the scheme is designed to be fully compliant with all the latest fire safety standards. Furthermore this scheme has had HSE and London Fire brigade referrals). The Access Officer has requested an accessible parking bay should be allocated to every M4(3) wheelchair accessible/adaptable unit. It should be noted that this exceeds the development plan requirement. Under the Traffic impact, Car/cycle parking, pedestrian safety section of this report it is explained that accessible parking has been provided in accordance with development plan requirements.

AIR QUALITY TEAM

The proposed development is located within the LBH Air Quality Management area (AQMA), and within LBH Hays Focus Area, bringing additional traffic emissions which will add to current poor air quality in the area. Proposals are required to improve air quality within Focus Areas. Based on the information provided in the Transport

Assessment report to support the planning application, the proposal is air quality neutral for transport emissions.

Due to the size of the proposed development and length of its construction period, the demolition and construction phase will pose significant impacts on local air quality, being classed as High risk for dust soiling and medium risk for human health. Therefore, suitable mitigation during the construction phase is required, managed and delivered through the implementation of an Environmental Construction Management Plan (CEMP).

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 of this size to be air quality neutral as minimum

and air quality positive, actively contributing to reduce pollutant emissions to the atmosphere.

DAMAGE COST AND MITIGATION MEASURES

The development is not Air Quality Positive and further action is required to reduce emissions. 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 level of mitigation required to the proposed development for traffic emissions is £7,963. Once all deductions were applied, the remaining value of mitigation due is £6,191. Flat rate deductions applied are as follow: Green Sustainable Measures (5%), Travel Plan (10%), contribution to long term LBH strategic long-term strategies (social support, modal shift strategies, etc, 20%), totalling a reduction of £3,185.

Therefore, a section 106 agreement with the LAP of £4,778 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 reduces human exposure to nitrogen dioxide levels.

Observations

In addition, the following conditions will apply. See text below.

Condition Air Quality - Low Emission Strategy

No shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall be focused on making the Travel Plan ambitious and make full use of the PTAL of the application site, and specify as a minimum the following

- 1) A clear and effective strategy to encourage residents 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 SI 1 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 Area(s). 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.

PLANNING OFFICER COMMENT

Given the findings above, planning conditions and a financial contribution of £4,778 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 reduces human exposure to nitrogen dioxide levels are recommended together with the impositions of the above planning conditions.

NOISE OFFICER COMMENTS (Summary)

It is recommended that prior to the Council making a decision, the Noise Assessment is updated in response to the comments raised above. In summary, this means:

- Providing a fuller description of the daytime and night-time soundscapes for the site as a whole.
- Providing photographs of the survey locations and sound sources.
- Providing commentary on the sound level time history charts.
- Describing how the summary sound levels have been determined, as well as those adopted around the development for the assessment of external and internal sound levels.
- Considering the potential for changes to the soundscapes in the foreseeable future.
- Updating the internal sound level calculations to reflect the relevant external sound levels and the ventilation and overheating control strategies, accounting for both the whole dwelling ventilation and overheating conditions.
- Providing clear presentation and description of the external amenity areas and the anticipated sound levels.

PLANNING OFFICER COMMENT

The applicants have responded to the comments made in respect of the submitted Noise Assessment and have updated the Report accordingly including matters of clarification and confirmation. The updated Noise Assessment has been assessed by the Council's noise consultant.

FURTHER COMMENTS (Summary):

The following conditions are recommended:

1. Each phase of the development shall not be occupied until full and final details are provided to, and approved by, the Local Planning Authority of the sound insulation scheme(s), and any other control measures, such that ambient sound levels are no higher than the relevant internal targets

within the current version of the ProPG: Planning & Noise accounting for both ventilation and overheating conditions, and to minimise levels within external amenity areas as far as practicable. Any sound generated within the development by associated plant shall be 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 EM8 of the Hillingdon Local Plan: Part One.

And

2. Each phase of the development shall not be occupied until full and final details are provided to, and approved by, the Local Planning Authority of any building services plant that would result in sound emitted externally, together with details of any required noise control to safeguard the amenity of the occupants of both the scheme and the neighbouring dwellings. The plant 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 EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012).

OFFICER COMMENT

These conditions are therefore recommended accordingly and is further discussed in Section 7.18 of this report.

SUNLIGHT DAYLIGHT AND OVERSHADOWING CONSULTANT (Summary)

Neighbours Impact Conclusion

Somewhat unusually for a central urban scheme, there are very few impacts at all with this proposal, either for the Illustrative or Maximum schemes. Where impacts are outside the BRE guidance they are small and all have good mitigating factors. In terms of neighbouring impact therefore we would agree with EB7's conclusion that the schemes are acceptable.

Conclusions; Proposed Development

AY are in agreement with the scope and methodology used. AY consider the overall daylight and sunlight amenity impacts to neighbouring properties and amenity areas to be acceptable. Within the Scheme there will be primary habitable rooms that achieve below the recommended targets for internal daylight and sunlight amenity but the levels of these are thought to be satisfactory with agreed mitigation.

The sun on ground overshadowing to proposed amenity areas is considered to be compromised but acceptable within the context of the development. The London Borough of Hillingdon will therefore need to take a contextual approach to consider the overall benefits of the Proposed Development alongside daylight and sunlight matters.

PLANNING OFFICER COMMENT

Officers note that there are some transgressions do occur in relation to the proposed development in terms of daylight and sunlight. However this is not unusual as daylight and sunlight is only one factor that influences people's wellbeing and the decision of where to live in an urban location, and should therefore be considered alongside a range of other amenities such as: location, access to public

transport, public open space, shops and recreation facilities and improvements to public amenity. In addition there are significant benefits arising from the proposal including a significant uplift in new homes, the quality of the homes to be provided and the consequential improvements to the local environment.

DESIGN AND CONSERVATION COMMENTS

The site and surrounds

The site is currently occupied by the Austin Road Estate which is known locally as the Hayes Town Centre Estate.

The existing estate comprises 260 homes that were built in the 1960s and 70s.

The site is 2.5 hectares in area and is bound by Pump Lane to the north, Crown Close to the west, the canal tow path to the south and a brick boundary wall adjoining the rear gardens of the houses in Little Road to the east of Austin Road.

The majority of the estate consists of three and five storey buildings providing a mixture of flats and maisonettes. One 15 storey block of flats, known as Skeffington Court, is located within a south-easterly location within the site adjacent to Silverdale Road. The southern boundary comprises eight terraced houses that front onto to Western View that runs adjacent to the Grand Union Canal.

The estate is accessed from an internal spine route at ground and first floor level. The internal spine route is poorly designed and offers little overlooking and as a result feels unsafe and provides a poor pedestrian environment. The internal spine route also means streets within the estate that have little activity or passive surveillance. This is exacerbated further with 'dead' inactive frontages to Austin Road.

The site is surrounded by a wide variety of uses, type and eras of development. Hayes Town Centre is focused along Station Road and Coldharbour Lane to the west and consists mainly of 2-3 storey buildings of varying periods with retail use at ground floor level.

Beyond the high street is a mixture of residential and industrial uses. The industrial uses developed historically along the canal and railway lines and are still in existence today. The industrial uses primarily consist of single storey metal sheds that are interspersed with some historic industrial buildings.

The surrounding residential areas consist of mainly 1930s and 1950s semi-detached housing with modern apartment buildings located on redeveloped sites along the Grand Union Canal.

The area around the site is currently undergoing significant change with large redevelopment being focused on former industrial sites either side of the Grand Union Canal.

There are two conservation areas close to the site, The Thorn EMI Conservation Area and the Nestle Factory Conservation Area, which are both located south of the site on the opposite side of the Grand Union Canal.

Other heritage assets that are located close to the site are three Statutory Listed Buildings: St Anselm Parish Church and Benlow Works which are seen in some wider views of the site and Enterprise House.

There are also three locally listed buildings close to the site: A warehouse on Silverdale Road, The Old Crown Pub on Station Road and Hayes and Harlington Train Station.

Layout

The illustrative Masterplan contains the Outline Area and the Detailed First Phase to show comprehensively how the regeneration of the estate could occur based on the fixed detailed design elements plus outline parameters.

The layout of the development is defined by five urban blocks. The urban blocks are designed to provide maximum frontages onto streets and will define public, communal and private space. The blocks will run from Pump Lane to Western View in a south-westerly alignment.

Three compact urban blocks are located between the Crown Close and Austin Road and a larger urban block is proposed to be located in the south of the site supporting an increase in scale along the Grand Union Canal. A narrower plot is also proposed on the east side of Austin Road that will complete a perimeter block with the adjoining houses on Little Road.

The proposals will create a new legible route that connects the site to the High Street via Crown Close and will include a new shared public space called Community Square. Community Square would create a focal point for the regenerated neighbourhood and would create a unobstructed pedestrian link from the High Street to Silverdale Road to the east. The square will reinforce legibility by providing an identifiable urban space at the centre of the site and will provide a suitable setting for the community centre.

The southernmost end of Silverdale Road is also proposed to be redesigned to create an improved pedestrian connection to the canal.

New apartment buildings will front onto the canal to provide activity and surveillance the blocks of which would align with the consented development to the east (1 Silverdale Industrial Estate). Careful attention will need to be given to the interface with Western View as the rear wall of the podium car park would be visible. Concerns would be raised if this presented a 'dead' frontage to the street.

The proposals will also introduce residential streets between Crown Close and Austin Road, defining three of the urban blocks. These streets will have a different character and scale, creating variety and a sense of place. This will improve connectivity through the new neighbourhood creating a more coherent and legible street network and would bring significant improvements to the area.

The illustrative masterplan is considered to be well conceived and acceptable. It represents one possible detailed design solution for the outline area of this application. Other detailed solutions could be permitted as part of the design stage for these future phases provided they follow the design principles described in the Design and Access Statement and within the framework set by the parameter plans.

Height, Scale and Massing

The scale and massing of the scheme has taken into consideration the site and the emerging context.

The scheme is designed to provide a readable datum height of medium rise buildings ranging between six and eight storeys. This is a scale which people can associate and feel comfortable and accords with other consented and built schemes within the local area. The changes in height also help to create variety and a more interesting skyline.

The datum height changes with the canal side blocks which increase to 10 and 12 stories. This reflects the scale of other buildings along the canal and High Point Village opposite. Despite the

similarities in height there is a concern that the two developments would create a canyon like effect along the canal. The design of these blocks will need to be carefully designed under any future reserved matters application as they sit close to the boundary and could appear oppressive within this part of the townscape.

Building Heights between Austin Road and Crown Close provide a good level of daylight to the shared gardens within the urban blocks. This has been achieved by lowering heights on the south side to 6 storeys. This coupled with the gaps between help to provide views of the sky and additional sunlight into the shared gardens.

The maximum of 6 storeys to Austin Road helps to provide a more comfortable transition to the two storey houses on Little Road. These would also be separated by the proposed two storey houses along the rear garden boundary of the houses to Little Road. This will help to mediate the scale between the proposed apartment buildings and existing houses whilst creating a perimeter block arrangement and frontages to both sides of Austin Road.

The Reserved Matters Application would provide further opportunities for a variety in massing across the scheme as well as a variety in elevational treatment.

Elevational Design and Treatment

The proposed development maximises active frontages by wrapping the perimeter of the blocks with active uses providing front doors and communal entrances directly onto the street. Non-active uses (e.g. bin storage, bike stores, plan rooms) have been hidden from view within the podiums wherever possible and the blocks have created an acceptable interface with the street allowing for natural surveillance.

The parking podiums will be hidden within urban blocks so that the streets and outdoor spaces will not be cluttered by parked cars.

The edge conditions will be largely soft landscaped providing defensible space around the perimeter of buildings for the residential units. Each edge condition is designed to reflect the street or space it defines. This will also help to reinforce character and contribute to the sense of place providing an attractive setting for the blocks.

It is envisaged that the new development should appear modern and reflect their residential use, with the architecture drawing inspiration from the established local palette of materials and Hayes industrial heritage to create a sense of place. This approach is supported and would celebrate the long-established character of the area in a contemporary manner allowing the new development to harmonise with its surroundings.

The indicative studies within the Design and Access Statement show how the development can draw on the materials and details of surrounding industrial buildings and how these can be developed into an architectural language for the new development. The emphasis on brick is considered acceptable and would provide a robust material that will weather and mellow sympathetically over time.

Impact on Heritage Assets

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and in relation to conservation areas, "special attention should be paid to the desirability of preserving or enhancing

the character or appearance of that area".

The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

London Plan Policy HC1 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. Development proposals should avoid harm and identify enhancement opportunities. This policy also applies to non-designated heritage assets.

There are 2 conservation areas located in close proximity to site which fall south of the Grand Union Canal, the Thorn EMI Conservations Area (south west) and the Nestle/ Rowntree Factory Conservation Area (south east).

There are 4 Grade II listed buildings within the immediate surrounds of the site; Botwell House which is north west of the site, Benlow Works directly east of the plot and Enterprise House south west of the site and St. Anselm Church. There are several locally listed buildings in the surrounds of the site including; The Old Crown Pub, Warehouse Silverdale Road, and Hayes and Harlington Station.

The Heritage, Townscape and Visual Impact Assessment identifies a number of static views the locations of which were agreed during pre-application discussions. The assessment demonstrates that the development would not be seen in the majority of views where there is heritage sensitivity.

Table 3 in the Heritage, Townscape and Visual Impact Assessment concludes the following:

Listed building

Botwell House
No harm

Benlow Works
No harm

Enterprise House
No harm

St. Anselm Church
Less than substantial

Locally listed building

The Old Crown Pub
No harm

Warehouse Silverdale Road
No harm

Hayes and Harlington Station
No harm

Conservation areas
Thorn EMI
No harm

Nestle/ Rowntree Factory Conservation Area
No Harm

I would agree with the assessment on the heritage assets except with respect to the non designated heritage asset The Old Crown Pub. It is considered that the proposed large 10 and 12 store blocks towards the canal frontage will have a negative impact on its setting. The public house currently benefits from modest buildings within its setting with the large tower block set back in views looking in northerly direction from the bridge. The harm identified would be less than substantial. The harm could be mitigated to some degree through a high-quality building design and sympathetic materials

The proposed scheme, however, generally relates more positively with the assets listed above than the existing buildings, is more sensitively designed to reflect the proportions and plot widths of building frontages and would make a positive contribution to the existing and emerging street character of this part of Hayes. However, as set out above there is less than substantial harm identified to two of the assets which will need to be taken into consideration.

Given the separation distance which exists between the proposed development and the conservation areas, emerging context and low visibility there is no harm to either of these assets.

With respect to the locally listed buildings, which fall in close proximity to the site, it is considered that the setting of the Crown Public House would be harmed by the development as outlined above.

In terms of the Grade II listed assets the impact of the proposed development within the setting of the assets, there would be less than substantial harm or no harm, as in the case of Botwell House were the proposals would not be visible in townscape views.

The proposed scheme introduces a distinctive, high quality architecture, which is scaled to address the established character of the area. In order to ensure that the outline element of the scheme continues to do this, the council must appropriately secure a design code which ensures the principles set out above are achieved.

Having regard to the statutory duties in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the NPPF in relation to listed buildings and heritage assets. The harm identified must be given considerable importance and weight. In accordance with the provisions of the NPPF the harm should be weighed against the public benefits of the proposals.

Phase 1 (Full Planning)

Phase 1 which forms the full planning element of this hybrid application is shown in detail. Blocks A and B would provide a total of 80 homes in two buildings with the car parking hidden below the communal garden in a parking podium, with vehicular access from Crown Close.

The blocks layout and heights adhere to the design principles set out within the illustrative Masterplan and Design and Access Statement. This will ensure that the development would form a

cohesive part of the overall development.

A mixture of duplex homes and apartments are provided at ground floor level which wrap the parking podium providing active frontages. The homes at ground floor level are provided with individual entrances and allow direct access and active surveillance to the street. The upper levels will provide one, two and three bedroom apartments which would be accessible by both stairs and lifts.

The communal garden above the parking podium has been designed to create an attractive and soft internal space that would only be accessible to residents in Buildings A and B. It will provide a shared amenity for recreation and play with the trees and planting providing a green outlook from the surrounding homes.

The communal entrances are double height at the corner of Pump Lane and Austin Road and are appropriately celebrated and distinct from the more modest and appropriately detailed domestic entrances to the duplex homes / flats accessed from the street. The shared entrance will be located and designed as a prominent feature of the building to give a sense of arrival and improve legibility.

The defensible space to the ground floor units is enclosed with railings and hedging. This is considered an appropriate solution and will create visual interest and softening to the base of the building and street.

The appearance of Phase 1 has been carefully developed to respond to the context and character of the area.

The level of architectural interest has been carefully developed to respond to; Pump Lane, Austin Road, the new residential street, Crown Close and podium garden. The approach has been to develop an alternative response to each condition in terms of the building form and detail, that is tied together with a coherent architectural language and palette of materials.

These elements help to provide a visually rich elevations of complimentary materials that reflect the more robust local palette of materials. The materials should weather satisfactory provided that high quality bricks are chosen along with a complementary mortar.

The above design approach is acceptable and the blocks are considered to be of a high standard of design that is reflective of the surrounding local / historic and emerging context.

The materials will need to be secured by condition so that the quality of the finishes are not value engineered out at implementation stage. The brick detailing and use of decorative glazed bricks (including specials) and windows, doors, balconies and railings as shown within the Design and Access Statement would create a pleasing high-quality finish that would be compromised if inferior cheap materials and workmanship were employed.

The detailed design of the building, the choice of materials and the quality of workmanship will be important factors in the success of the overall scheme.

Conclusion

The scheme, for the above, reasons, is generally considered to be of a high standard of design and respectful of the surrounding context.

Should the application be minded for approval then I would be happy to suggest conditions for the submission of further details, materials and sample panels etc.

PLANNING OFFICER COMMENTS

Urban design and layout is discussed further in Section 07.07; impact on the character & appearance of the area at Section 07.03 and the impact on archaeology/CAs/LBs at Section 7.03 of this Report. In addition Officers have recommended that materials are submitted by way of a planning condition to ensure that the quality of materials to be used remains high.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

ESTATE REGENERATION & HOUSING

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

Policy GG4 (Delivering the homes Londoners need) of the London Plan (2021) states that to create a housing market that works better for all Londoners.

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

In addition the proposed development makes up Site C of the SA23 Site Allocation in the Local Plan Part 2 (2020). The Plan allocates the site for 400 residential units together with improvements to connectivity with the town centre, a new public open space, integration with and activity on the canal side, and enhancement of the strategic canal corridor and some active frontages at the ground floor level.

As the site is located within the Hayes Opportunity Area and Hayes Housing Zone, London Plan Policy SD1 - Opportunity Areas is applicable. The London Plan sets indicative targets for the Hayes area to deliver 4,000 additional homes and 1,000 additional jobs. The net gain of 240 homes through this proposed redevelopment would contribute positively to meeting the indicative target for new homes

London Plan Policy SD10 - Strategic and local regeneration is also relevant in that it provides support for regeneration initiatives that tackle inequalities including environmental, economic and social barriers that affect the lives of our communities. The provision of new homes which meet modern space and building standards, together with the improved layout of the estate will significantly improving living conditions for return and new residents.

London Plan (2021) 'Policy H8; Loss of existing housing and estate regeneration' relates specifically to proposals for housing estate regeneration. It sets a number of parameters with the key ones to this development discussed below.

As required by Part A of policy H8, the application proposes a net increase in overall affordable floorspace of 5,686 sq m which equates to a net gain of 40 units with 91 habitable rooms. This equates to a total affordable housing provision of 51.7% by floor area (53% by habitable room and 47.8% by dwellings) of the entire scheme. There is also an increase in density which is discussed below in the density section of this report.

Part C of Policy H8 states that:

'Before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider alternative options first. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding.'

This requirement is also reflected in the Mayor's Good Practice Guide to Estate Regeneration (2018).

Prior to the application submission a full and thorough review of the differing levels of physical intervention was undertaken. This considered the refurbishment of the existing homes within the estate; partial redevelopment; and full redevelopment options. The analysis took account of the scope for increasing the number of homes across the site in contributing to identified needs; access and on-site constraints; and whether that intervention option would significantly enhance the living accommodation of existing residents on the estate and enable the delivery of wider regeneration benefits to the surrounding area.

The options appraisal, prepared by the applicant's commercial advisor, confirmed that the existing homes are no longer fit for purpose in terms of environmental performance, space standards and accessibility, and as such do not meet current living standards. The Appraisal identified that the full redevelopment scheme would be likely to generate significant socio-economic benefits for both residents and the wider area through a more comprehensive approach to regeneration of the estate.

Full redevelopment to include holistic redesign provides an opportunity for significant improvements to the quality of stock for a longer period of time, to include in relation to the energy and sustainability performance of dwellings, as well as improved standards of living. This in addition to a significant uplift in the overall volume of units which is considered preferential and together these benefits justify this scale of intervention. The options appraisal and feedback from initial consultation and engagement with existing residents was presented to Council Cabinet. Members convened and voted to approve further work on the full redevelopment of the existing estate.

Officers are satisfied that this information clearly demonstrates how the overarching objectives for the estate regeneration scheme will deliver safe and better quality homes for local people; increase the overall supply of new and affordable homes; and improve the quality of the local environment through a better public realm and provision of social infrastructure (e.g. schools, parks, or community centres). Consequently compliance with with Part C of the Policy is achieved.

In addition, and as stated above, as this estate regeneration scheme involves the demolition of existing homes, the proposal should provide:

- an increase in affordable housing;
- full rights to return or remain for social tenants; and
- a fair deal for leaseholders and freeholders.

In addition to the above a resident's ballot was undertaken. In accordance with the GLA's requirements, the proposals and re-housing offer were set out in a written Landlord Offer (as approved by LBH Cabinet) and eligible residents were provided with an opportunity to vote yes or no to the regeneration proposals. 79% of residents voted yes for full

redevelopment of the existing estate from a high turnout of 90%. In November 2021, the GLA approved LBH's bid, under the Building Council Homes for Londoners Programmes 2020/2022 which includes grants for replacement homes as well as additional new homes.

Given the evidence above Officers are satisfied that the application proposals are in full compliance with the requirements of Policy H8 part C and the Mayor's Good Practice Guide to Estate Regeneration (2018) as the proposals have demonstrated how the wishes of residents and other stakeholders have been taken into account.

Part D of Policy H8 requires that an estate redevelopment programme, should re-provide an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.

As stated above the proposals would deliver a net increase in overall affordable floorspace of 5,686 sq m which equates to a net gain of 40 units or 91 habitable rooms and consequently the proposal is in compliance with Part D of Policy H8.

In terms of Part E, a Viability Tested Route, this is further discussed at Section 7.13 of this report however it concludes that the scheme is considered to be in compliance with Part E of Policy H8 of the London Plan in that it is providing the maximum possible amount of affordable housing.

In summary, the proposed development would ensure a net increase in existing affordable housing floorspace and would accord with the requirements and key principles for estate regeneration as set out in London Plan Policy H8 and the associated guidance in the Mayor's Affordable Housing and Viability SPG and the Mayor's GPGER. The regeneration of the estate also provides the opportunity to increase local housing supply and deliver benefits to the wider community through the provision of new and improved homes in accordance with Policies H1 and SA23 of the Hillingdon Local Plan: Part 2 (2020) and Policies SD1, SD10, H8 and GG4 of the London Plan.

COMMUNITY SPACE PROVISION

Chapter 8 of the NPPF promotes the creation of healthy and safe communities. NPPF 92 states that this should "promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other" and the provision of strong neighbourhood centres, easy street layouts and active street frontages are identified as means of facilitating this.

London Plan Policy GG1 reinforces the above at a regional level, recognising that in building strong and inclusive communities, development must "provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation".

Policy DMCI 1 of the Hillingdon Local Plan: Part 2 (2020) also seeks to retain existing community facilities only permitting the loss of existing provision if it can be demonstrated that the specific use is no longer required. This includes confirming that it will not lead to a

shortfall in provision and / or the facility is no longer appropriate and any replacement / relocated provision offers a level of accessibility and standard of provision at least equal to that of the existing facility.

The existing estate benefits from the provision of a community space which is located on the ground floor of one of the residential buildings adjacent to Skeffington Court which measures approximately 115 square metres. The application proposal seeks permission for a replacement facility up to a maximum floorspace of 140 sq m hence a similar sized albeit marginally larger provision.

Parameter Plan 1 (Land uses) confirms the proposed location of the community centre within Development Zone 4 of the Outline element of the scheme. The parameters fix the community centre within this location so that it provides an active frontage onto the proposed new Public Open Space in the form of the Community Square, as established through the hard and soft landscaping parameters of Parameter Plan 5. The submitted Plan shows the extent of the frontage is shown onto the proposed square. Further details will come forward as part of a future RMA and Officers have recommended a phasing condition to ensure that it is delivered as part of Phase 4 of the development proposal.

In addition to the above Officers have recommended that there is an obligation contained within the section 106 agreement that will ensure that there will be a minimum provision of at least 120 sq m and this will be delivered to shell and core at a peppercorn rent to all parts of the community.

Given that this is considered to form the heart of the new estate at the juncture of key north-south and east-west movement routes together with an increase in its size Officers consider this provision represents Accordingly therefore the re-provision is in accordance with LP Policy CG1 and LPP2 Policy DMCI 1 in that there will no loss in existing community provision on the site.

7.02 Density of the proposed development

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

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

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

As this is a Hybrid planning application it is important to acknowledge it is formed of two parts, detailed element of 80 new homes and the outline area for a further 420 homes.

Across the site as a whole a total of 500 new homes would replace the existing 260 units on the estate, resulting in an uplift of 240 units. In density terms, this results in approximately 208 units per hectare (u/ha).

Table 5.2 which accompanies Policy DMHB 17 identifies an appropriate density range of for Hayes Town Centre comprising mostly flats between 150 - 250 u/ha. Given that the proposed density is calculated as 208 it falls within the this range.

In addition and as highlighted in the urban design and character and appearance sections of this report, the proposals are supported by a strong design-led justification, which supports this level of density and is also driven by the quantum required to meet the estate's housing needs and achieve additional affordable (and private sale) homes to enable a viable regeneration possible.

In addition the site has a high PTAL rating and there are numerous bus connections in close proximity to the site including good links to Hayes Town Centre and Hayes and Harlington Railway Station. The site is therefore in a very accessible location.

For these reasons the proposed density is considered appropriate and compliant with Policy DMHB 17 and Policy D3 of the London Plan.

UNIT MIX

Policy H10 of the London Plan (2021) requires that schemes consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:

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

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

The proposed development would provide the following Unit Mix which is illustrated for the

Detailed Phase 1 and the Outline element as a scheme overall.

The dwelling mix for the detailed Phase 1 is set as follows:

1 bed - 23 homes (29%)
2 bed - 37 homes (46%)
3 bed - 16 homes (20%)
4 bed - 4 homes (5%)
Total - 80 homes

In addition the Outline element of the proposals for a further 420 homes is predicted to provide the following mix for the scheme in its entirety:

One bedroom units - 38%
Two bedroom units - 43%
Three and four bedroom units - 19%

A planning condition is proposed to be attached to secure the above unit mix throughout the outline area of the planning permission.

As stated by the Council's Planning Policy Officer, London Plan Policy H10 covers the mix of uses in the scheme, the range of tenures in the scheme and the nature and location of the site, with a higher proportion of one and two-bed units generally more appropriate in areas which are closer to a town centre or station or with increased public transport access and connectivity.

The proposal does not completely align with the objectives of Policy DMH 2 (which was not written with estate regeneration schemes in mind); in that it does not reflect the latest information on housing needs, however, the site is located within Hayes town centre and it has a PTAL of 4 to 5, suggesting a good/ very good level of public transport accessibility. It is also noted that the housing mix is driven by the housing needs generated by the existing estate and the need to make provision for those residents seeking to return. Given these specific circumstances, a lower proportion of family units is considered acceptable on this site.

In light of the housing need the proposal is considered to comply with Policy DMH2 of the Hillingdon Local Plan: Part 2 (2020).

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 AND LISTED BUILDINGS

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and in relation to conservation areas, "special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area".

The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

London Plan Policy HC1 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. Development proposals should avoid harm and identify enhancement opportunities. This policy also applies to non-designated heritage assets.

There are 2 conservation areas located in close proximity to site which fall south of the Grand Union Canal, the Thorn EMI Conservations Area (south west) and the Nestle/Rowntree Factory Conservation Area (south east). There are 4 Grade II listed buildings within the immediate surrounds of the site; Botwell House which is north west of the site, Benlow Works directly east of the plot and Enterprise House south west of the site and St. Anselm Church. There are several locally listed buildings in the surrounds of the site including; The Old Crown Pub, Warehouse Silverdale Road, and Hayes and Harlington Station. The applicant has provided key views from 16 locations agreed with the Council.

As highlighted above the site is not within a Conservation Area and there are no local or statutory listed buildings within the site. However, there are a number of heritage assets within close proximity, this includes Silverdale Road Warehouse (locally listed and formerly a chair factory built in 1907) to the east and the Old Crown Public House (Grade II listed building) to the west. Slightly further afield is Benlow Works, a four storey Grade II listed Victorian industrial building, which is located to the east of the site along Silverdale Road and the Parish Church of St Anselm, a Grade II listed building to the west, beyond Station Road.

Further to the south east and west there are two Conservation Areas, Botwell Nestles and Botwell Thorn, which sit beyond the canal.

The proposed scheme relates more positively with the surrounding heritage assets than the existing buildings, is more sensitively designed and would make a positive contribution to the existing and emerging street character of this part of Hayes. Given the separation distance which exists between the proposed development and the conservation areas, emerging context and low visibility there is no harm to either of these assets. With respect to the locally listed buildings, which fall in close proximity to the site, the proposed architecture offers an improvement to the settings of these assets and thus there is no harm. In terms of the Grade II listed assets the impact of the proposed development within the setting of the assets, there would be less than substantial harm or no harm, as in the case of Botwell House were the proposals would not be visible in townscape views. The proposed scheme introduces a distinctive, high quality architecture, which is scaled to address the established character of the area. In order to ensure that the outline element of the scheme continues to do this, the council must appropriately secure a design code which ensures the principles set out above are achieved.

Having regard to the statutory duties in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the NPPF in relation to listed buildings and heritage assets, the LPA consider that the proposed redevelopment of the site would cause less than substantial harm to the historic significance of the surrounding assets. In accordance with the provisions of the NPPF the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

The comprehensive redevelopment of the site would make the most efficient use of land and optimise residential and non-residential uses which is supported from a strategic perspective. The proposed scheme appreciably improves the existing situation and introduces a distinctive, high quality architecture, which is scaled to address the established character of the area. The scheme would also provide 51% affordable housing

In light of the information set out above, the LPA consider the proposed scheme and its public benefits would outweigh the less than substantial harm arising from the from the proposed development and accord with Policies DMHB 1, DMHB 2, DMHB 3 and DMHB 4 of the Hillingdon Local Plan: Part 2 (2020) and Policy HC1 of the London Plan (2021).

7.04 Airport safeguarding

Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020) states that:

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.

The National Air Traffic Services, Heathrow Airport Ltd and the Ministry of Defence have been consulted as part of the application process. The National Air Traffic Services and Heathrow Airport Ltd have confirmed that there are no safeguarding objections.

The Ministry of Defence has confirmed that they have no concerns with regards to the proposed building heights for the development and as Officers have recommended for approval, planning conditions would secure a robust bird hazard management plan together with a condition limiting the roof heights of the buildings.

Subject to such conditions, the proposal would not be considered contrary to Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

7.05 Impact on the green belt

The site is not within or adjacent to any designated Green Belt.

7.07 Impact on the character & appearance of the area

Policy BE1 of the Hillingdon Local Plan: Part 1 (2012) requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) sets out more detailed guidance on design matters.

Given this is a Hybrid application it is important to examine both the outline element and the detailed elements in turn.

OUTLINE MASTERPLAN

Turning firstly to the Outline Masterplan, the site layout has been designed to re-establish a traditional streetscape, with new public realm, play facilities and landscaping to provide a more pedestrian friendly environment. The key urban design moves enable a clear framework of streets with different scales and characters. This framework is defined by five urban blocks. The urban blocks are designed to provide maximum frontages onto streets and will clearly define public, communal and private space.

Three compact urban podium blocks are located between Crown Close and Austin Road. A larger urban block is located in the south of the site supporting an increase in scale along the Grand Union Canal. A narrower plot on the east side of Austin Road will accommodate a row of 2 storey mews style houses which would back onto the gardens of houses on Little Road.

The underlying approach has been to optimise the footprint and height, to support the objective of 'liveable streets' and to create a street scale legible architecture, that the current estate fails to provide. The Masterplan illustrates a clear rationale for the distribution of height across the site to reinforce place-making and legibility. The scheme is designed to provide a range of medium rise buildings between six and eight storeys to reflect the scale of London's mansion block heritage rising to taller buildings of 10 and 12 storeys adjacent to the canal which signal the intersection between the canal and the high street.

Crown Close is envisaged as a mixed use street adjacent to Hayes Town Centre. Crown Close will provide access to new homes and a through route from Pump Lane to the High Street. Crown Close will have different uses each side of the street - with medium rise apartment buildings on the east and existing commercial uses on the west. Apartment buildings will have duplex homes at ground and first floor level to provide lots of entrances and surveillance.

Silverdale Road is envisaged as canalside street which blends with the Grand Union Canal in terms of its landscaping and architecture. It will provide an important pedestrian connection between two public spaces the newly created 'Community Square' and the Grand Union Canal. The street will be pedestrian priority in order to support and encourage pedestrian access to and from the canal. Landscaped steps across the length of Silverdale Road will provide a connection to the canal.

A new 'Community Square' is the heart of the new Masterplan. The square would be linked to all the main streets in the development and also lies on the main pedestrian desire line to the High Street. The Square will also provide an 'urban event' and place to pause as pedestrians pass through. The Square will be a setting for community focused activity and will provide a setting for the new community centre located at ground floor level..

Western View, which fronts onto the canal, will be a shared pedestrian / cycle route to the front of the new buildings and is designed to integrate with redevelopment proposed for the Silverdale Industrial Estate and the town centre.

In terms of building height, 10 and 12 storeys is proposed fronting onto the canal. The proposed heights are designed to reflect the scale of the open space and other building along the canal. Opposite the site High Point Village is 9 storeys and to the west consented proposals for the Silverdale Industrial Estate will deliver new apartment buildings up to 9 storeys. The proposed 12 building is designed to create a legible figure which signposts the connection between the Canal and Silverdale Road. The 10 and 12 storey buildings will also create variety in the roofscape along the canal.

In terms of east-west building heights, the heights between Austin Road and Crown Close have been carefully designed to provide a good level daylight to the shared gardens within urban blocks. This has been achieved by lowering heights on the south side to six storey. Gaps between buildings have been introduced to provide views of the sky and additional sunlight into the shared gardens.

A maximum six storey building height is proposed on Austin Road to transition proposed heights down to the scale of existing houses on Little Road located to the east. In addition a row of two storey mews houses are proposed along the rear boundary to houses on Little Road. This will mediate the scale between the proposed apartment buildings and existing houses. The two storey houses will also reflect the height of duplexes at the base of apartment building and two storey building height in gaps. The houses will be semi-detached separated with gaps which will provide articulation to the future terrace.

DETAILED PHASE 1

Phase 1 is located in the north of the site and will front onto Pump Lane, Austin Road, Crown Close and one of the schemes new residential streets. The site will face onto commercial uses to the north of the site on the opposite side of Pump Lane with the Hayes Muslim Centre and multi-storey car park to the west on the opposite side of Crown Close.

Phase 1 consists of two buildings of the same typology, with Building A rising to eight storeys and Building B to 6 storey which are interlinked with duplex homes at 2 storeys in height. Each of the buildings are arranged around a single core with duplex accommodation at ground and first floor level. Duplex homes are provided as a mixture of 2 bed and 4 bed homes. All 4 bed duplex are provided with a private terraces at first floor level facing onto the communal garden. All 2 bed duplex are provided with a balcony at first floor level. All homes at ground floor level have an individual entrance to the street and front gardens. All homes are provided with private outdoor amenity space in the form of a balcony or terrace.

All homes at ground floor level are provided with individual entrances, and allow direct access to the street and provide active surveillance at street level. One, two and three

bedroom apartments are proposed at upper floor levels, accessible by stairs and lifts. The site is relatively flat avoiding the need for stepped or ramped access into the building. The typical upper floor plan is designed with seven apartments per floor. The layout of apartments is arranged to avoid any north facing single aspect homes. This has been achieved by locating a longer slimmer apartment (with a west aspect) and the core on the north side of each building.

Car parking is located below the communal garden in a parking podium, with vehicle access from Crown Close. A mixture of duplex homes and apartments are provided at ground floor level which wrap the parking podium with active accommodation. Whilst there is a cycle store at the ground floor fronting onto Pump Lane Officers have secured an improvement to the treatment of this part of the building to ensure that it becomes part of an active frontage.

The level of architectural interest has been carefully developed to respond to; Pump Lane, Austin Road, the new residential street, Crown Close and podium garden. The approach has been to develop an alternative response to each condition in terms of the building form and detail, that is tied together with a coherent architectural language and palette of materials. As noted by the Council's design officer, the entrance is designed as a prominent feature of the building to give a sense of arrival and improve legibility. The entrance lobby will be well overlooked from surrounding building as well as pedestrian and vehicle activity along Crown Close. In particular the facade has gridded by brickwork piers with the proposed fenestration referencing surrounding industrial buildings.

Overall, the design of the detailed phase provides a high quality architectural response which echoes the wider industrial character, enhances the evolving character of Pump Lane and provides a high quality of accommodation for future occupiers. This is considered to provide a positive response to the requirements of Policy D3 of the London Plan (2021), Policy BE1 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

TALL BUILDINGS

Policy D9 of the London Plan (2021) states that Development Plans should define what is considered to be a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18m measured from ground to the floor level of the uppermost storey. Policy DMHB 10 of the Hillingdon Local Plan: Part 2 (2020) further defines tall/high buildings and structures in Hillingdon as those that are substantially taller than their surroundings, causing a significant change to the skyline. Policy DMHB10 also identified Hayes Town Centre as an area of the borough suitable for tall buildings.

Officers have assessed the development and consider that given the majority of the scheme is facing two storey buildings, the proposed buildings of 6-12 storeys are substantially taller than their surroundings. Officers also consider that there will be a significant change to the skyline will be experienced from mid-range views, with a more moderate impact from long range views. On this basis the development is considered to include tall buildings.

Given the development is located with a preferred tall building location, the principle of tall buildings accords with the location part of policies D9 and DMHB10. However, it is necessary to consider the local impacts in more detail as per the relevant policy criteria.

This includes visual impacts, functional impacts, environmental impacts and cumulative impacts. ,

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

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

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

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

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

Section 07.11 of the report addresses security and Section 07.22 of the report addresses fire safety.

In terms of the impact of the proposed development on the microclimate, the applicant team have lodged a Wind and Microclimate Assessment , the summary and findings of this report stated the following:

1. that there are no negative impacts on off-site conditions;
- 2.the Phase 1 show that the intended comfort conditions are within the intended comfort range;
3. the ground floor has standing and sitting comfort conditions
4. internal balcony areas on buildings G and I have conditions suitable for walking, one condition windier than recommended;
5. The outline area in development zone 4 have some unsafe areas in the windiest conditions however these areas can have suitable mitigation measure which would come forward at RMA stage;
6. Cumulative impacts of developments in the area have minimal impact on Phase 1 however they do impact on development zone 4.

Accordingly, details of the proposed wind mitigation measures are to be secured by condition if recommended for approval.

Based on the evidence presented and assessed through this report, the proposed tall buildings are considered to be appropriate in terms of their location and impacts, as required by policies D9 and DMHB10.

7.08 Impact on neighbours

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

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

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

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space.

The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. The impact of the development should also be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".

The Mayor's Housing SPG explains that Building Research Establishment (BRE) good practice guidelines and methodology can be used to assess the levels of daylight and sunlight being achieved. However, it is clear that these should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing output and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development" (paragraph 2.3.47). As such "quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London" (paragraph 2.3.47). In this respect "decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm" (paragraph 1.3.46).

This guidance has been carried forward within the Draft Good Quality Homes for All Londoners Guidance (October 2020) at pages 62-63 which reinforces the importance of this approach in decision-making.

OVERLOOKING / PRIVACY

The nearest existing residential properties to the application site are located on Little Road, the rear gardens of which are sited to the east of the proposed development. In addition there are some residential flats which are located above the commercial properties along Station Road that are approximately 15 metres to the west of the site. The properties on Crown Close are in commercial use with largely blank frontage resulting in no overlooking and privacy issues. To the south and east would be a future residential building as part of the scheme discussed in the paragraphs below.

Detailed Phase 1

Turning firstly to the detailed Phase 1 element, this building will be set back from its frontage onto Pump Lane and the closest property is the hotel on the opposite side of the road, approximately 18 metres to the north. Given that the building is in hotel use Officers consider that there is an adequate separation distance to not lead to any unacceptable adverse impact on privacy or lead to any unacceptable overlooking conditions.

Outline Element

The outline parameters have been designed to ensure a minimum 20 metre separation distance between the (eastern) outer building footprint of the Development Zone 4 (canal side buildings) and the locally listed building which sits opposite fronting onto Silverdale Road. The parameters also allow for a minimum 15 metre separation distance between the Development Zones of the Outline Area and the Detailed First Phase.

For development Zones 2 and 5 to the south and east of the Detailed First Phase respectively, an 18 metre separation distance will be achieved between the built edges of Blocks A and B and the outer building footprint of the Development Zones. Officers consider that this will prevent any risk of creating overbearing impact whilst also protecting the amenity of those living within the Detailed First Phase and future residents of the adjacent later phases. It should be noted that in the majority of areas, the development does not technically accord with the minimum separation distance of 21 metres between habitable rooms. However, the development blocks are all created around a network of new roads in and around the site and it is generally accepted and has been permitted that separation distances can be reduced where this formal street layout is created.

In summary both the detailed and outline elements of the proposals accord with Policy DMH16 and Policy D6.

DAYLIGHT/SUNLIGHT

A Daylight, Sunlight and Overshadowing Assessment has been undertaken by eb7 and submitted as part of this application. This gives consideration to the levels of daylight and sunlight being achieved within the proposed development. This provides information on the residential amenity of future occupiers as well as the impacts on sensitive neighbouring receptors to understand the potential for change as a result of the regeneration of the estate. The external communal (private) amenity areas and public open spaces have also been assessed to understand the potential for overshadowing and ensure that the design facilitates the maximisation of the usability of these spaces in accordance with LP Policy D6.

The daylight impact has been assessed on the basis of Vertical Sky Component (VSC) and No-Skyline (NSL) tests measured for all the windows and rooms of the surrounding properties which are considered sensitive receptors.

Officers commissioned an external consultant review of the daylight, sunlight and overshadowing report and the findings of this review are outlined in the consultation section of this report. In summary, the Council's consultants review agreed with the scope and methodology used. They also consider the overall daylight and sunlight amenity impacts to neighbouring properties and amenity areas to be acceptable. Within the Scheme there will be primary habitable rooms that achieve below the recommended targets for internal daylight and sunlight amenity but the levels of these are thought to be satisfactory with agreed mitigation. The sun on ground overshadowing to proposed amenity areas is considered to be compromised but acceptable within the context of the development.

Based on the findings of this external report Officers consider that the impacts are considered typical and acceptable for such an urban regeneration scheme, and the sky visibility is retained in line with what would be expected within an urban context, as set out within the Mayor's Housing SPG and draft Good Quality Homes for All Londoners Guidance (October 2020). It is considered that the properties will still achieve satisfactory levels of residential amenity and the proposed development will not result in any unacceptable harm.

Given the proposals seek to optimise the estate's regeneration potential, there will inevitably result in a degree of change for the surrounding built environment. However, the maximum (and indicative) parameters demonstrate a positive design response to the nearest residential receptors in seeking to not adversely impact on neighbouring amenity in accordance with London Plan Policy D6. The scheme is considered to be in line with the intentions and specific flexibilities set out in the BRE guidance and the design works hard to directly respond to the nearby neighbours whilst maximising housing delivery at the site.

7.09 Living conditions for future occupiers

INTERNAL LIVING CONDITIONS

Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this all residential development or conversions should:

- i) meet or exceed the most up to date internal space standards, as set out in Table 5.1; and
- ii) in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users.

Table 3.1 of London Plan (2021) Policy D6 requires the following:

- One storey 1-bed 1 person unit should provide a minimum of 39 square metres Gross Internal Area (GIA) with a bathroom (or 37 square metres with shower room);
- One storey 1-bed 2 person unit should provide a minimum of 50 square metres GIA;
- One storey 2-bed 3 person unit should provide a minimum of 61 square metres GIA;
- One storey 2-bed 4 person unit should provide a minimum of 70 square metres GIA;
- One storey 3-bed 4 person unit should provide a minimum of 74 square metres GIA; and
- One storey 3-bed 5 person unit should provide a minimum of 86 square metres GIA.

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

Based on the plans submitted, all of the proposed units within the first phase of 80 new homes meet and in some cases exceed the minimum space requirements.

In terms of outlook, all the units within the detailed element of the application have good levels of outlook with 50 of the 80 homes (62.5%) being dual aspect with none being north facing single aspect units. In terms of the outline element the configuration of the outline masterplan presents opportunities for these minimum space standards to be exceeded and could achieve 76% dual aspect units based on the maximum parameters. In turn, there are no north-facing single aspect units and 100% of the larger three and four family bedroom homes are dual aspect. These elements will come forward for further detailed scrutiny when reserved matters applications are brought forward.

PRIVATE AMENITY SPACE

Policy DMHB 18 of the Hillingdon Local Plan: Part 2 (2020) states:

- A) All new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.2.
- B) Balconies should have a depth of not less than 1.5 metres and a width of not less than 2

metres.

C) Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site.

D) The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.

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

In terms of the detailed phase providing 80 new homes, based on a proposal for 23 no. 1-bed units, 37 no. 2-bed units, 16 no. 3 bed units and 4 no. 4-bed units (80 homes in total), the proposed development would require 1,595 square metres of private amenity space.

Based on the submitted plans, the proposed development would provide 836 sqm of private amenity space across ground floor front gardens, ground floor rear gardens and first floor and above balconies. This element would therefore be below the requirement set out by Policy LPP2 Policy DHMB18 and LP Policy D6.

In terms of the outline element for a further 420 homes whilst no exact details have been provided in terms of private amenity space as this will be covered by future RMA's detailing balconies, private gardens and podium space areas it is predicted that a total of 4,736 square metres of private space could be provided. However, Officers have calculated that the Policy compliant area of private open space required by the mix proposed to be 8,390 sq m. During the course of negotiating the reserved matters application, the Council will look to ensure that the development maximises the provision of private and communal amenity space to limit the shortfalls on site. However, the current shortfall in quantum of amenity space proposed which creates a conflict with policy DMHB18.

PUBLIC OPEN SPACE

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

Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) states that the Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes.

Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough. The Council will identify new opportunities for open space through an Open Space Strategy. Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities.

Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020) states that proposals for major new residential development will be supported where they make provision for new open

space, or enhancements to existing open space, which meets the needs of the occupiers of the development. In major town centre developments, the policy identifies that new civic space may be required as an alternative to green open space.

The proposed plans indicate that 4,748 sq m of publicly accessible open space is to be provided. This equates to 19% of the Site and comprises the Austin Road Strategic Public Open Space Area and greening within the streetscene, to include to the perimeter of the blocks as well as new landscaped areas. For these reasons the proposal would accord with Policy DMCI 4 of the Hillingdon Local Plan:Part 2 (2020), Policy EM4 of the Hillingdon Local Plan: Part 1 (2012) and Policy G4 of the London Plan (2021).

PLAY SPACE PROVISION

Policy S4 of the London Plan (2021) states that residential development proposals should incorporate good-quality, accessible play provision for all ages. At least 10 square metres of play space should be provided per child that:

- a) provides a stimulating environment
- b) can be accessed safely from the street by children and young people independently
- c) forms an integral part of the surrounding neighbourhood
- d) incorporates trees and/or other forms of greenery
- e) is overlooked to enable passive surveillance
- f) is not segregated by tenure

This is supported by the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10m² of useable child play space to be provided per child, with under-fives play space provided onsite 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) specify that 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds.

Based on the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', play space requirements is divided into 3 categories;

- age 0-4; door step play/within 100m;
- age 5-11 years; play within 400m of site;
- age 12+ years; play within 800m of site.

Based on the GLA Population Yield Calculator (v3.2), it is anticipated that the following numbers would be yielded from the proposed development:

- 138 no. children under the age of 5 years old;
- 107 no. children aged 5 to 11 years old; and
- 77 no. children aged 12 to 17 years old.

This yields a total of 322 children, requiring 3,220 square metres of play space where only the 0-4 age group and 5-11 age group must be provided on site or within 400 metres of the site. The required provision is set out below with the proposed on site provision figures in brackets.

0-4 - 1,380 sq m (on site provision is 1,314)

5-11 - 1070 sq m (on site provision is 853)
12-16 - 770 sq m (none provided)

Total requirement across all ages groups if therefore 3,220 sq m.

Based on the submitted plans, the proposed development would provide 2,167 sq m on site, which caters for all doorstep play which is the minimum required on site. The quantum would also cater for proportion of 5-11 year olds which is encouraging, albeit that can be provided up to 400 metres from the site.

The closest parks/recreation grounds to the application site are Botwell Green Sports and Leisure Centre to the north (within 400m walking) and Lake Farm County Park to the west (within 800m walking) which as part of the estate-wide play space strategy represent provision that will be available and accessible to meet the needs of the 5-11 year olds and 12+ years olds from first occupation. These areas would cater for the residual 5-11 year olds and all 12 and above.

The proposed on-site child play space provision is considered to meet the requirements of policies DMCI5 and of the Local Plan and policy S4 of the London Plan subject to a condition securing the detail of the play space provision.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

In terms of streetscape and transport connectivity, the application proposals include the following:

Austin Road serves as a primary route through the site by connecting north-south of the scheme, keeping the main traffic flows away from the primary pedestrian and cycle routes. It would be realigned eastwards by approximately 15 metres and will connect with Silverdale Road which runs up to the canal.

The proposed connection streets between the newly aligned Austin Road and Crown Close creates improved permeability between for the masterplan allowing greater active frontages. These connecting residential streets also operate at reduced speeds in these shared surface areas where pedestrians and cyclist movement occurs, without dedicated routes.

Vehicular movement through these areas is anticipated to be low and they primarily serve to create permeability between primary streets and serve podium parking and servicing of the scheme, such as delivery and refuse collection.

In total the new street would have 29 on street car parking spaces interspersed with landscaping strips and lighting creating an attractive street and there will be a further 84 spaces beneath the podiums. These spaces will be for residents only.

The Western View route will provide access to delivery and drop off to the block on the southwest part of the masterplan, which vehicles can use the area from which the building footprint has been set back from the highway boundary to turn so they can access/egress Western View in forward gear.

In terms of Crown Close this is to remain as one way and will - re- alignment of Crown Close and there will be a total of 12 pay and display/permit spaces on both sides of the street. Finally, given the town centre location, no car parking is proposed to serve the proposed community use given there are visitor spaces in the vicinity.

TRAFFIC & PARKING

The site is located on Austin Road. Based on TfL's WebCAT planning tool, the site has a PTAL rating of between 3 and 5 with the majority of the site being within PTAL 4.

The following planning policies are considered:

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

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

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

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

London Plan Policy SD1 - Opportunity Areas is also applicable and is outlined in full in Section 7.01 however in summary it seeks, amongst other things to ensure that Opportunity Areas fully realise their growth and regeneration potential. In relation to car parking provision it is important to acknowledge that the car parking ratio seeks a maximum of 0.5 spaces per dwelling.

RESIDENTIAL CAR PARKING PROVISION

In terms of car parking provision for the overall scheme as illustrated in the Masterplan the proposal seeks a reduction in the current car parking on site from 223 spaces to 113 spaces. 29 spaces will be on the new network of streets as described above and a further 84 spaces will be provided beneath the podiums in each of the blocks. This results in an on-site car parking ratio of approximately 0.23 spaces per dwelling. The Local Plan policies set a maximum parking standard of 0.5 spaces per dwelling based on the PTAL and the site being within an opportunity area. The 29 spaces proposed within the new network of internal streets will be within the existing Parking Management Scheme of the local area. Therefore, the development will be eligible to 29 permits to enable future occupants to park in these new network of streets. In all other respects, this development will be a 'car lite' and otherwise permit free development and future occupants would not be eligible (save for the 29 permits) to apply for a parking permit to park on the local highway network.

In terms of Phase 1 and consistent with the estate-wide car parking strategy, a total of 22 car parking spaces will be provided as part of the Detailed First Phase. This will include 19 car parking spaces provided beneath the podiums at ground level of Blocks A and B, to include 2 disabled bays for "Blue Badge" holders. In addition, 3 car parking spaces will be provided on-street along the secondary internal east-west estate road to the south of Block B, to include 1 disabled bay for "Blue Badge" holders and 1 car club space. This equates

to a ratio of 0.28 car parking spaces per residential unit based on the Detailed First Phase only and 3.8% provision of car parking for disabled persons.

This reduction is welcomed by officers given the site is in an accessible location close to a range of public transport offers, within an Opportunity Area and the proposals therefore accord with Policies SD1 and T6.1 of the London Plan.

PHASE 1 CAR PARKING

Within Phase 1 of the development, 19 undercroft (beneath the podium) parking spaces are proposed which include 2 disabled spaces and 4 EVCPs and there will also be 3 spaces on street giving a total provision of 22 spaces. On this basis the proposals are compliant with the London Plan Policy.

AUSTIN ROAD AND CROWN CLOSE

The proposals include parking provision along Austin Road, the new 'connecting streets' between the new buildings and along Crown Close. The spaces along Crown Close currently accommodate 18 permit/pay and display spaces on the local highway to serve the wider area. The future proposals would deliver 12 spaces hence a slight reduction to that currently provided.

In order to ensure that the car parking spaces are provided to those residents who currently hold parking permits on the existing estate and in line with the Landlord Offer Officers are recommending that, a Parking Management and Allocation Plan condition is attached to the permission. This will require further detail to be submitted including the monitoring, enforcement and review and also ensure that all on-site parking spaces shall be solely for the use by future residents of the development.

In terms of future provision of the car parking spaces a planning condition securing a Parking Design and Management Plan, is considered appropriate.

ELECTRIC 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.

The proposals include a commitment to provide a policy compliant level of 20% which would be a 100 spaces for the overall schemes and there will be 4 spaces for the detailed phase 1 element. The provision of these spaces will be covered as part of the recommended suite of car parking related planning conditions.

On this basis the proposal are compliant with Policy 6.1 of the London Plan.

CAR CLUB

In addition there will be an on site car club of up to 4 spaces, free membership for 3 years and £50 credit for one person per unit and this has been secured by Section 106 obligator

COMMUNITY SPACE

No car parking is proposed for the on-site community space, akin to the current arrangement. It is however considered necessary to restrict the occupation of the space to Use Class F2 (b) 'b) a hall or meeting place for the principal use of the local community' for avoidance of doubt that the space is intended for local use.

MEASURES TO ENCOURAGE SUSTAINABLE TRAVEL

Active Travel Zone Assessment

A suite of Active Travel Zone / Healthy Street works identified by the applicant in their Transport Assessment, based on the Council's term contractors schedule of rates this would be £76,811. These measures are proposed to encourage walking and cycling for all future residents and to encourage modal shift away from the private car, the measures include:

Tactile paving at the junction of Halsway and Minet Drive
Tactile paving at the junction of Showers Way and Minet Drive
Tactile paving at the junction of Minet Gardens and Minet Drive
Tactile paving at the junction of Hunters Grove and Minet Drive
Tactile paving at the junction of Silverdale Road and Little Road

The total sum sought for these works of £76,811 and will be secured via an obligation within the Section 106 Agreement.

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 via a planning condition.

Appendix C, Table 1 of the Hillingdon Local Plan: Part 2 (2020) states:

"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. For dwelling houses, proposals must leave enough space between the

dwelling and vehicle (1200mm) to allow access for a wheelchair user in accordance with the Council's Accessible Hillingdon SPD May 2013."

The proposed development would provide designated disabled persons parking bays and exceeds the 3% requirement which is equal to approximately 4 no. spaces of the total of 113 spaces to be provided. The proposals illustrate 15no. disabled parking spaces proposed and is therefore policy compliant and a condition is recommended to that effect.

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.

CYCLE PARKING

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

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

In addition, residential developments should provide the following short-stay cycle spaces:

- 5 to 40 dwellings: 2 spaces
- thereafter: 1 space per 40 dwellings

Based on the Phase 1 detailed plans, the development proposes 149 cycle spaces for the occupiers and 4 spaces for visitors, the outline phase is predicted to require a total of 912 spaces and 16 short stay spaces for visitors. This amount will be conditioned to secure policy compliant on-site cycle parking on a phase by phase basis.

TRIP GENERATION

The Transport Assessment (TA) has described that the proposals include changes to the local highway network in terms of carriageway alignments, widths and on-street parking arrangements, reflective of the scale of regeneration. These proposals are reliant on the stopping up of existing areas of public highway extent, for which subsequent applications will be made, with such an application for Phase 1 to immediately follow a planning application and a condition in relation to future phasing is recommended as part of this report.

The TA has quantified the anticipated multi modal trip generation associated with the proposed scale of development and concluded that the proposals will not result in a material traffic impact, with the range of public transport services able to accommodate the anticipated multi modal demand.

SERVICING AND DELIVERY

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

CONSTRUCTION LOGISTICS PLAN

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

condition.

SUMMARY

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

7.11 Urban design, access and security

URBAN DESIGN

The design of the proposed building is considered in Section 07.07 of the report.

ACCESS

This is considered in Section 07.12 of the report.

SECURITY

Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;
- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

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

The Metropolitan Police were consulted during the course of this application and the Secure By Design Officer advised that the "site at present at poor from a security design perspective, and the proposals I believe will be a significant improvement. I have met with representative from both sites on two occasions and reviewed the sites and both sites are capable of achieving Secured By Design Gold accreditation as the general premise is strong from a crime prevention stand point."

There are significant Anti Social Behaviour problems associated within the Austin Road estate which are well documented and this can be partly due to the existing design of the estate which lacks permeability and surveillance and active street frontages. The design of the development proposals as highlighted in Section 7.07 of this report illustrate how good design can help reduce these problems in the future.

The Secure By Design Officer has therefore recommended the imposition of the Secure By Design conditions to ensure that the future design meets Secure By Design standards and provides a better environment for the existing and future residents of the local area.

7.12 Disabled access

DISABLED ACCESS

Policy D5 of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design. They should:

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

Policy D7 of the London Plan (2021) states:

A) To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:

- 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

In terms of the detailed element of the scheme all unit layouts have been designed to meet Part M4(2) and 10% of units would meet Part M4(3) standard.

This equates to 8 no. wheelchair accessible units and the submitted plans illustrate that these are all accessible via lifts. In terms of the outline element this would equate to 50 units.

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

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

7.13 Provision of affordable & special needs housing

AFFORDABLE HOUSING PROVISION

Policy H4 of the London Plan sets out a strategic target for 50 percent of all new homes delivered across London to be genuinely affordable and that major developments which trigger affordable housing requirements should be subject to the threshold approach (Policy H5).

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

Policy DMH 7 of the Hillingdon Local Plan: Part 2 (2020) states that 50% affordable housing should be delivered with the tenure split 70% Social/Affordable Rent and 30% Intermediate. In exceptional circumstances, where on-site provision of affordable housing cannot be delivered and as a last resort, a financial contribution will be required to provide off-site affordable housing on other sites which may be more appropriate or beneficial in meeting the Borough's identified affordable housing needs.

The Mayor's Affordable Housing and Viability SPG and Policy H8 of the London Plan set out that as well as ensuring no net loss of affordable homes, all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing.

The current tenure mix of private and affordable housing on sites is as follows:

Existing homes:

Affordable / Social Rent - 199 homes (12,177 sq m with 715 hab rooms (hr))

Private / Leasehold homes - 61 homes (4,057 sq m with 232 hr)

Total - 260 homes (16,234 sqm with 947 hr)

The proposed tenure mix across the detailed and outline scheme is proposed as follows:

Affordable / Social Rent - 239 homes (17,863 sq m with 806 hr)

Private / Leasehold homes - 261 homes (16,670 sq m with 714 hr)

The above demonstrates that the proposals would deliver a net increase in overall affordable floorspace of 5,686 sq m which equates to a net gain of 40 units or 91 habitable rooms. In addition the quality of the accommodation proposed would also be enhanced. The overall percentage of affordable housing proposed is 53.8% by habitable room.

As required by London Plan policy H8, the applicant has submitted a financial viability assessment. The FVA has been comprehensively assessed by the Local Planning Authority's independent advisors who conclude the scheme cannot provide any additional affordable housing units above the current offer of and state the following:

'We have undertaken an assessment of the proposed Development with 53.8% affordable housing (by hab room) as proposed by the Applicant. Taking into account the recommended amendments of this report, we have concluded that the proposed Development with 53.8% affordable housing generates a deficit of -£21,754,940 against the viability benchmark'.

Notwithstanding the results of the viability modelling and the assumed deficit, the applicant intends to proceed at these levels of affordable housing to deliver the wider benefits of regeneration of the Austin Road Estate on the basis that the deficit is taken into account within review mechanisms to be captured in the Section 106 agreement (and to be agreed with the GLA).

It is also necessary, in accordance with the GLAs Affordable Housing and Viability SPG to secure a early, mid and late stage review mechanism. This review will be based upon the agreed assumptions of the submitted viability appraisal, and will ensure that any potential surplus generated throughout the build period is captured as additional affordable housing.

The applicants 'Right to Return' agreement or 'Landlords offer' ensures all 199 households currently within affordable units within the existing estate will be offered homes within the proposed development. However, they also have the opportunity to remain in another home offsite if they have been relocated to enable demolition of the existing estate. It should also be noted that the applicant is offering resident homeowners (leaseholders 33 households in total) the opportunity to purchase a new property on the regenerated estate on a shared equity basis if required, with the other 28 homeowners being non-residents i.e. landlords.

In light of the above, the scheme is considered to be providing the maximum reasonable affordable housing, taking into account the need to re-house all existing residents, in compliance with Part E of Policy H8 of the London Plan 2021.

7.14 Trees, landscaping and Ecology

TREES

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

Policy DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) states that all development proposals are required to comply with the following:

- i) All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and
- ii) Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

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

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) states:

- A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The application does include the loss of trees as outlined in the aboricultural report as follows:

Detailed Phase 1 - this will require the removal of 10 trees/groups/hedges to enable the development, including 5 x B grade specimens.

Outline / Phases 2-5 application will result in the loss of a further 29 trees/groups/hedgerows, including 11 x B grade specimens. The tree impacts will need to be reviewed and re-assessed as Phase 2-5 come forward.

The net effect of this is that the proposed development is likely to have a visual impact on the area, however, replacement planting as part of a comprehensive landscape scheme

will provide some mitigation for this loss. Whilst the loss of trees is regrettable Officers consider that in consultation with the Landscape Officers that the Landscape Strategy for the development as a whole is acceptable. given the loss of circa 39 trees on site and in order to ensure no net loss, a condition will be imposed seeking the planting of a minimum of 39 trees throughout the development site to support the adequate re-provision of green infrastructure.

Consequently, the proposal complies with Policies DMEI 1, DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020).

URBAN GREENING FACTOR

Policy G5 of the London Plan (2021) states:

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

The information submitted confirms that the proposed development achieves a score of 0.34 which is below the target score which creates a conflict with policy G5. Nonetheless it is possible to increase this score through use of a condition on the outline consent that requires the applicant to explore additional measures to reach the specified target of 0.4 within the reserved matters application submissions.

ECOLOGY

Paragraph 174 of the NPPF (2021) states that planning decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is supported by Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

LP Policy G6 relates specifically to biodiversity and access to nature, seeking to protect and where possible enhance sites and habitats of biodiversity value. For development proposals, the impacts on biodiversity should be managed with the aim of securing net biodiversity gain. It states that "proposals which reduce deficiencies in access to nature should be considered positively".

At a local level, LPP2 Policy DMHB14 expects landscape scheme for development proposals to support and enhance biodiversity and amenity particularly in areas deficient in green infrastructure". On this basis, LPP2 Policy DMEI7 is clear that "the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where there is unavoidable loss, replacement features of equivalent biodiversity value should be provided on-site.

A Preliminary Ecological Appraisal (PEA) has been undertaken and submitted. This confirms that there are no overriding ecological constraints to the Proposed Development and includes a Biodiversity Net Gain (BNG) calculation to demonstrate the significant enhancements that the Proposed Development and comprehensive regeneration of the estate will bring to the Site and wider biodiversity network in line with the expectations of national, regional and local planning policy.

There are no statutory designations of national or international importance within the boundary of the Site or within 2km of the Site boundary; however the most notable being the Grand Union Canal to the south as part of London's Canal's Site of Metropolitan Importance.

There is an increase in population anticipated to be generated from the proposal when compared to the current baseline position, the extensive green infrastructure, public open space and public realm coming forward as part of the Proposed Development, means that there will be opportunities for Biodiversity enhancements in and around the site.

In terms of the Grand Union Canal specifically, the PEA identifies the potential for impacts from construction in terms of dust deposition and water pollution due to the proximity to the site. However, through best practice measures used during the demolition and construction phases, it is concluded that any such impacts can be appropriately mitigated. The recommendations of the submitted PEA have informed the submitted Illustrative Demolition and Phasing Strategy (including Demolition and Construction Method Statement) and the Outline Construction Logistics Plan and on this basis the proposal will not result in any loss or damage to the Canalside biodiversity.

Officers consider, that subject to an appropriately worded condition, the proposal accords 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

SUSTAINABLE WASTE

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

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that:

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

In terms of the Illustrative Masterplan, this has been designed to include one loading bay within each of the secondary internal estate roads that runs east-west between the perimeter blocks. This is in addition to provision on the re-aligned Austin Road, adjacent to communal bin stores. For those Development Zones fronting Crown Close, refuse collection will occur on-street. For residential units within Development Zone 4 at the southern end of the Site, a satellite bin store on the south western corner will rely on management to transfer these bins to a communal store adjacent to the Silverdale Road frontage, with the car park access acting as a turning head in this location.

Specific details will come forward through the submission of RMA's, however Officers consider that this strategy is well considered.

Turning to Phase 1 of the development, Communal bin stores are proposed at ground floor within both Blocks A and B, along their respective frontages onto Austin Road and Crown Close. These have been located to ensure that refuse collection points are within a 10m drag distance for the LBH refuse team on collection days. A dedicated loading bay will be provided adjacent to the bin store fronting Austin Road, allowing refuse collection to take place off the carriageway. For the bin store fronting Crown Close, on-street refuse collection is proposed given the carriageway width of 5.5m allows a large vehicle to pass a stationary refuse collection vehicle. A loading bay is then proposed within the internal estate road, to the south of Block B, sized to accommodate more general delivery demands generated by vans such as online shopping and supermarket deliveries. This will complement the provision on Austin Road and each of the loading bays will be supported by an appropriate traffic regulation order to manage hours of operation and length of stay.

The waste and refuse team have been consulted and offer no objection to the proposals and accordingly, the proposed development is considered to accord with Policy EM11 of the Local Plan: Part 1 (2012) and Policy DMHB 11, part D), of the Hillingdon Local Plan: Part 2 (2020).

7.16 Renewable energy / Sustainability

RENEWABLE ENERGY

Policy DME1 2 of the Hillingdon Local Plan: Part 2 (2020) requires that:

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

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

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

In terms of the outline element of the proposal the proposed preferred energy strategy for efficiency purposes comprises a hybrid solution using a fabric first approach comprising passive and active design measures at the "Be Lean" stage; a centralised heat pump system, incorporating Air Source Heat Pumps (ASHP's) at the "Be Clean" stage; and , Photovoltaic (PV) panels to supply renewable electricity at the "Be Green" stage. On the basis of the Illustrative Masterplan, this will achieve a reduction in CO2 emissions of 100% and therefore demonstrates the potential for net carbon-zero to be achieved on-site without any off-site requirements.

Turning to the detailed Phase 1 element the submitted Energy Statement and Sustainability Strategy for the provides specific details on the proposed measures and commitments that will come forward within Blocks A and B. This is wholly consistent and has been prepared in conjunction with the estate-wide strategy to ensure a comprehensive approach to redevelopment and enable the first phase to positively contribute to the strategic environmental objectives of the proposal as a whole.

Through a series of measures, the detailed Phase successfully demonstrates how the preferred energy strategy for the Estate performs against the LP Energy Hierarchy and will achieve a 102% reduction beyond Building Regulations. It will therefore achieve net zero-carbon on-site and provide significantly better quality homes for existing returning and new residents early on in the regeneration of the estate.

In terms of the outline elements of the proposals whilst the Energy Strategy seeks to achieve net zero-carbon reduction this will only become apparent when further details are submitted in relation to each of the subsequent phases. For these reasons Officers are recommending that a carbon offset contribution requirement is included within the Section 106 Agreement, to capture any shortfalls that may arise in later development phases.

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

OVERHEATING

Policy SI 4 of the London Plan (2021) states:

A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- 2) minimise internal heat generation through energy efficient design;
- 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
- 4) provide passive ventilation;
- 5) provide mechanical ventilation; and
- 6) provide active cooling systems.

As set out in the Energy and Sustainability Statement, the London Plan overheating checklist has been used to assess the risk of overheating in the flats. Accordingly, the risk of over solar overheating is minimised.

The submitted Overheating Assessment demonstrates how the potential for internal overheating has been minimised through appropriate design solutions and in accordance with the GLA's cooling hierarchy. In testing the detailed unit layouts of Blocks A and B, it confirms that the blocks have been well designed to adapt and deal with overheating in the near future when compared with current data and near future data. They ensure very high levels of operable windows and the provision of blinds as part of the build specification, which will enable future residents to adapt the units in order to achieve thermal comfort. The design of the glazing and the overhangs in the facade is noted to have assisted in

minimising the amount of solar gain getting in through the building fabric. The detailed Phase of the proposal is therefore considered to provide a good standard of internal residential amenity. Conditions will be imposed to secure suitable design in the later development phases to minimise the risk of overheating.

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

7.17 Flooding or Drainage Issues

Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision of flood risk and surface water flooding mitigation will be refused.

The proposed drainage strategy incorporates green infrastructure and SuDS features into the proposed drainage strategy. The Lead Local Flood Authority has raised no objection to the proposals subject to the inclusion of a condition would secure the final detail of the drainage strategy.

Subject to such a condition, the proposed development is not considered contrary to Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policies SI 12 and SI 13 of the London Plan (2021).

7.18 Noise or Air Quality Issues

NOISE

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

Policy D14 of the London Plan (2021) states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

- 1) avoiding significant adverse noise impacts on health and quality of life
- 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
- 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquility)
- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any

potential adverse effects should be controlled and mitigated through applying good acoustic design principles

7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

The application site has numerous noise sources, traffic from surrounding roads and also noise from the local Strategic Industrial Land to the east of the site and whilst a noise assessment has been submitted, officers have identified a number of areas where further details are required and conditions are therefore necessary to secure a well designed and acoustically sound development proposals within the detailed and outline phases of the development.

Subject to meeting these requirements which will be secured by condition the proposal would accord with Policies D13 and D14 of the London Plan and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

AIR QUALITY

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

Policy DME1 14 of the Hillingdon Local Plan: Part 2 (2020) states:

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

B) Development proposals should, as a minimum:

i) be at least "air quality neutral";

ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and

iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

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

The proposed development is located within the LBH Air Quality Management area (AQMA), and within LBH Hayes Focus Area, bringing additional traffic emissions which will add to current poor air quality in the area. Proposals are required to improve air quality within Focus Areas. Based on the information provided in the Transport Assessment, the proposal is air quality neutral for transport emissions.

However, given its location in a Focus area the development is required to be Air Quality Positive. This means that further action is required to reduce emissions. 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.

A damage cost of £4,778 is to be secured through the S106 agreement to contribute towards the delivery of Hillingdon's air quality local action plan.

Subject to the proposed mitigation, the proposed development would accord with policies EM8 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020).

7.19 Comments on Public Consultations

Please see Section 06.1 of the report.

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states:

A) To ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

B) Planning obligations will be sought on a scheme-by-scheme basis:

i) to secure the provision of affordable housing in relation to residential development schemes;

ii) where a development has infrastructure needs that are not addressed through CIL; and
iii) to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

C) Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

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

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

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

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

i. Affordable Housing: Planning obligation for an on-site provision of at least 199 Social Rented homes and 40 London Affordable Rented homes (equivalent to 17,863 sqm in gross floorspace and 806 habitable rooms). This shall include an Early, Mid and Late Stage Viability Review mechanism as defined by Policy H5 of the London Plan (2021).

ii. Air Quality Contribution: A financial contribution amounting to £4,778 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 reduces human exposure to nitrogen dioxide levels shall be paid to address the air quality impacts of the proposed development.

- iii. Highways Works: Section 278 agreement to secure highway works.
- iv. Local Highways Improvements/ATZ: A financial contribution amounting to £76,811 shall be paid to the Council for the local highway improvements.
- v. 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.
- vi. Grand Union Canal Quietway contribution amounting to £60,000 shall be paid to the Council for the enhancement of the canal towpath.
- vii. Parking Permits: The residents of this development will not to be eligible for parking permits within the Parking Management Areas (within the exception of 29 permits) and Council car parks in the vicinity of the site, apart from Blue Badge holders and a charge made against the site to ensure the future buyers are aware of the parking restrictions.
- viii. HUDU Health Contribution: A financial contribution amounting to £49,820 shall be paid to the Council for the enhancement of health infrastructure provision.
- ix. 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.
- x. A Healthy Streets final sum to be confirmed following conclusion of discussions with GLA/TfL (current request is £335,000);
- xi. Community space of at least 120 sq m and to a maximum of 140 sq m shall be delivered to shell and core at a peppercorn rent;
- xii. Land shown as POS on Parameter plan 5 (Hard and Soft Landscaping) shall remain in POS in perpetuity.
- xiii. Carbon Offset contribution. In the event that the subsequent outline phases of the development are not net zero a carbon offset payments shall be paid to the Council's carbon offset fund relating to the outline phases of this development.
- xiv. Housing Strategy; Details of the Right to Return arrangements to safeguard the returning residents;
- xv. On site car club of up to 4 spaces, free membership for 3 years and £50 credit for one person per unit;
- xvi. Project Management & Monitoring Fee: A financial contribution equal to 5% of the total cash contributions

All planning obligations are required to be paid upon implementation in order to ensure infrastructure improvements are in place prior to occupation.

COMMUNITY INFRASTRUCTURE LEVY (CIL):

The scheme would also be liable to pay Mayoral CIL at a rate of £60 per square metre (plus indexation) and Hillingdon's Community Infrastructure Levy of £95 per square metre (plus indexation) for residential development.

7.21 Expediency of enforcement action

Not applicable to application.

7.22 Other Issues

FIRE SAFETY

LP Policy D12 states that "in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety". It goes on to provide a set of criteria that must be satisfied in order to ensure this and outlines that a Fire Statement must be submitted as part of planning applications for major development proposals to demonstrate compliance and provide details on how the development proposals will function in accordance with a further set of requirements.

In line with the above, from 1 August 2021, the Government introduced further guidance on fire safety and high rise buildings which must be considered as part of the planning process, this is known as "Planning Gateway One". Where development comprises a "relevant building", as defined by the guidance, a Fire Statement must be submitted as part of any relevant planning application setting out the fire safety considerations specific to the development proposals and the Health and Safety Executive have been consulted directly.

In accordance with the LP Policy D12 and Planning Gateway One, a Fire Statement has been submitted as part of this application to address the future requirements in relation to the Detailed and Outline Areas and states that there is compliance with the Building Regulations. This provides details on the design and materiality of the indicative blocks and how they have been configured in accordance with Building Regulations. This confirms that the buildings and their indicative layouts within the Outline Area, to include access and servicing arrangements have been designed to ensure that the proposed development will satisfy the criteria set out under LP Policy D12 and the further guidance and therefore ensure the safety of all future residents and users.

It should be noted that all apartments in the development will be provided with sprinkler protection in accordance with BS9251:2021. The designs of the residential cores, such as travel distances based on the illustrative mastplan, are generally compliant within the common areas in accordance with ADB. Where travel distances are greater than 7.5m a mechanical smoke system will be installed and developed and validated using CFD at a later design stage. An automatic opening vent will be provided at the head of each staircase to provide make up air to the system.

In addition, elements of structure will achieve varying levels of fire resistance dependent on the height of each block. All blocks over 18m in height will be provided with a firefighting shaft. The shaft will incorporate a firefighting stair, smoke clearance and a dry main. Blocks under 18m will incorporate a dry riser in the protected escape stair.

Both the London Fire Brigade and Health and Safety Executive (HSE) have been consulted on the application proposal. The London Fire brigade raise no objections. HSE have not objected, but have nonetheless stated that insufficient evidence has been produced to make specific comments, this is considered to relate to parts of the application being in outline form. The applicants have also responded and clarified that a dry riser will be

provided in all blocks with fire service access to within 18m of the dry riser inlet provided via the surrounding roads. Officers consider that a condition is necessary such that further work occurs on the fire safety strategy at RMA stage. Therefore a final fire strategy will be secured by condition and will need to be assessed by a suitably qualified Fire Safety Specialist.

Subject to such a condition it is considered that the proposal would accord with Policy D12 of the London Plan (2021).

CONTAMINATED LAND

Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

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

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INFRASTRUCTURE ASSESSMENT

Policy D2 of the London Plan (2021) states that an unallocated site that may cause planned infrastructure capacity to be exceeded might need to provide additional infrastructure proportionate to the development. This can only be identified through an infrastructure assessment during the planning application process. The application site has been identified as a site with redevelopment potential and by virtue of Policy SA23 an assessment was not considered necessary, however, the planning application secures adequate infrastructure to support the proposed development by virtue of planning obligations and CIL monies, for most infrastructure needs arising from the development.

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).

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 coordinated 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 C11 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 will be eligible to apply for a social housing Community Infrastructure Levy exemption. However, given that the Development Infrastructure Funding Study prepared for the Hayes Housing Zone/ Opportunity Area identifies the need for additional health facilities the HUDU Planning Contributions Model has been used to assess the health service requirements and cost impacts of the development as a result of 40 additional affordable homes being provided. A financial contribution amounting to £49,820 has been calculated and would be secured as part of the Section 106 legal agreement if recommended for approval.

EQUALITIES IMPACT ASSESSMENT

An Equalities Impact Assessment (EQiA) has been submitted in support of the application proposal which identifies both negative and positive impacts as follows:

Negative

- The impact of the disruption of rehousing may have a short term disproportionately negative impact on older people, vulnerable people or those with a disability.
- Procedures will be put in place to mitigate against any negative impact including a dedicated decant officer, a comprehensive package of support for moving arrangements including all the costs being covered, and a packing service.

Positive

There are many positive impacts of the proposed redevelopment which would benefit people with protected characteristics. These are outlined below.

- The new design allows for step free access to all areas - this will be particularly beneficial for those with mobility issues and parents with young children.
- The new homes will incorporate occupational therapist recommended adaptations and 10 of all homes are being designed to wheelchair accessible standards - this will be particularly beneficial to those with mobility issues, their carers and some older residents.
- The new estate will include a mixture of flat types, some with open plan kitchen dining living rooms and some with separate kitchens to cater for different preferences.
- There will be a greater range of homes available, from one bed to four bed homes - this will benefit families with children and those in extended family groups.
- There will be discrete residential blocks around resident only courtyard communal gardens and fewer homes per communal entrance - this will aid community cohesion and safety.
- The existing community room at Hayes Town Centre will be provided in a new facility with frontage to a new public square - aiding community cohesion.
- There are many positive impacts of the proposed redevelopment which would benefit people with protected characteristics. These are outlined below.

It concludes by stating that the redevelopment will provide positive opportunities for existing residents and the wider community, including those with protected characteristics. This is because it provides more affordable homes of a higher quality that are safer, more fuel efficient and accessible, therefore improving the quality of life for people of all ages and backgrounds.

The EQiA confirms that it has taken into account the views of residents in drawing up its final rehousing proposals and these are reflected in a specific Local Lettings Policy. In particular it has made provision for eligible residents in private rented and TA to stay on the estate in order to further community cohesion. It is identified that if the redevelopment proceeds it may have some short-term adverse impacts on certain groups, for instance older or more vulnerable residents. The disruption of moving can cause anxiety for residents but there will be procedures in place to mitigate this as part of its rehousing proposals.

Officers consider that the submitted EQiA is a comprehensive and robust assessment and that there are significant benefits to the existing and future residents and wider community.

GLA Stage 1 Response

Whilst the majority of issues raised within the GLA Stage 1 response have been addressed within the body of this report, the GLA Stage 1 report has also requested the imposition of conditions relating to the Circular Economy Policy to ensure sustainable waste management and to maximise the re-use of material and also Whole Life Cycle conditions to maximise onsite carbon dioxide savings. These requested conditions have been attached to the draft conditions.

8. Observations of the Borough Solicitor

General

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

Material considerations are those which are relevant to regulating the development and use

of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

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

Planning Conditions

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

Planning Obligations

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

Equalities and Human Rights

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

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

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

9. Observations of the Director of Finance

Not applicable

10. CONCLUSION

In conclusion, the redevelopment of the existing Austin Road estate to provide up to 500 new homes (an uplift of 240 homes) and the re-provision of a community facility of up to 140 sq m is supported.

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

The affordable housing offer is agreed as the maximum viable. The proposed affordable tenure mix provides an uplift in affordable rented housing, which is a notable benefit of the scheme and fully complies with Policy H8 of the London Plan.

The proposed scale and mass of the development are considered appropriate within the context of the site. The quantity of private amenity space offered would fall slightly short of the development plan standards creating a minor policy conflict which has been afforded limited weight. Sufficient play space would be provided, alongside new areas of public open space. It should also be noted that the proposals are an estate regeneration scheme, and there is a significant improvement proposed over existing areas of private and public amenity space. In addition the new layout is designed to create a safe and welcoming environment. A slight deficit against the Urban Greening Factor target of 0.4 has also been identified. However, again, this has been afforded minimal weight given the potential to improve the situation through the reserved matters applications.

New apartment buildings will front onto the canal to provide activity and surveillance the blocks of which would align with the consented development to the east (1 Silverdale Industrial Estate). The proposals will also introduce residential streets between Crown Close and Austin Road, defining three of the urban blocks. These streets will have a different character and scale, creating variety and a sense of place. This will improve connectivity through the new neighbourhood creating a more coherent and legible street network and would bring significant improvements to the area.

The illustrative outline masterplan is considered to be well conceived and of a high quality design.

Existing crime issues associated with the estate are partly driven by the layout of the estate; which has various areas lacking surveillance and lots of poorly designed, confined spaces, which do not feel safe at night-time. The proposals enable a completely new layout, that addresses the failings of the existing layout. The Metropolitan Police Crime Prevention Officer has been involved at both pre-application and application determination and supports the proposals.

The proposed parking provision is considered acceptable, and the agreed local highway improvement works would complement the intensified use of the site. They would be a benefit of the scheme. The proposed development is also considered acceptable with regard to its impact on neighbour amenity, access, security, landscaping, ecology, refuse, energy, flooding, noise and contaminated land.

The proposed development will provide a significantly enhanced townscape. The design is considered to respond well to the local character whilst optimising the site to provide over 250 new homes, including 40 additional affordable units. The standard of accommodation for new and returning residents will be high, with homes that meet modern space and energy standards and new areas of public open space that open the development up to the town centre and the canal.

Overall, the scheme delivers significant benefits, particularly the delivery of high-quality, affordable homes, new public spaces and a layout that will create a safe and welcoming environment. The many positive benefits of the proposals weigh heavily in favour of an

approval recommendation.

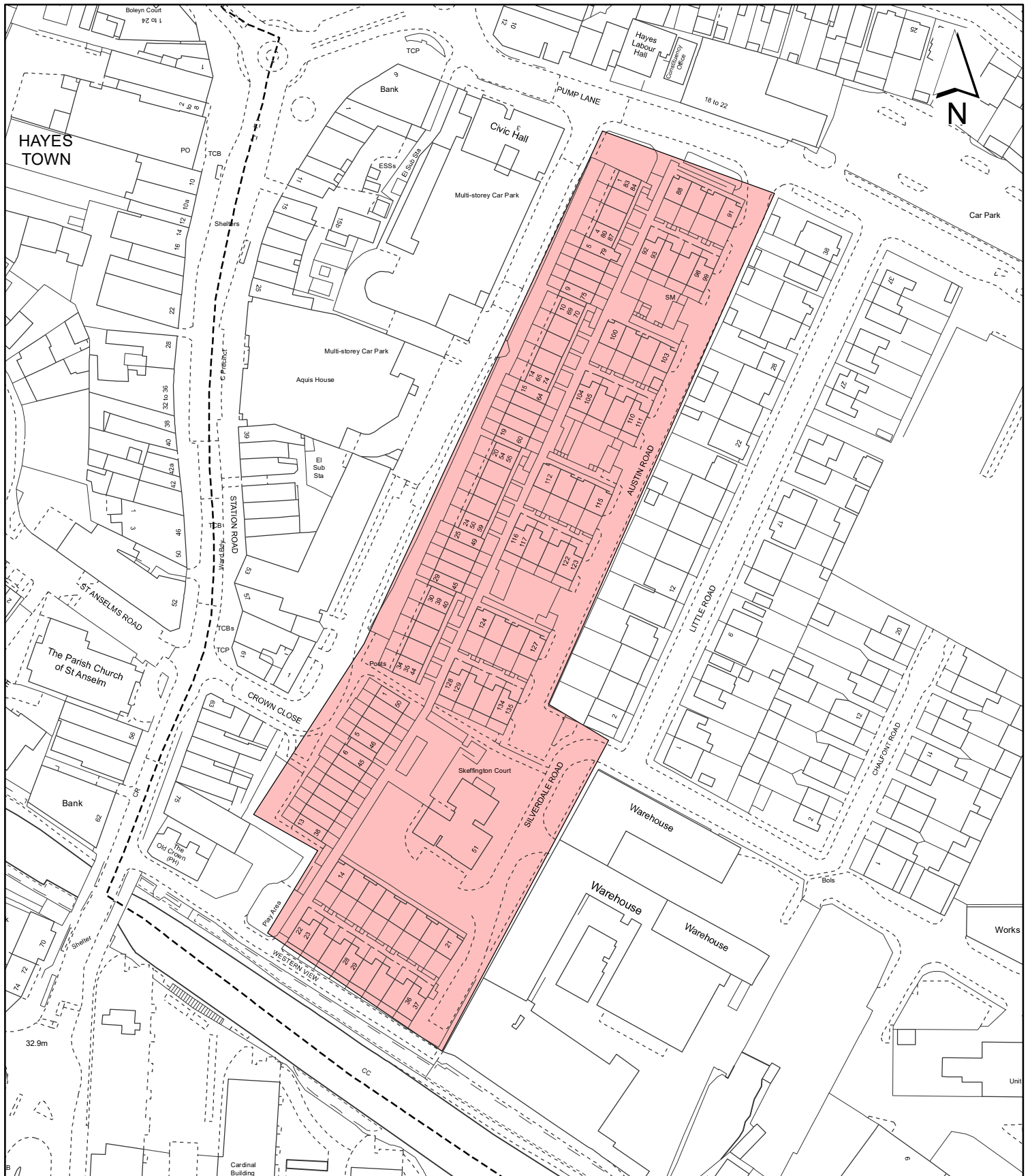
Subject to planning conditions and a Section 106 legal agreement, this application is recommended for approval.

11. Reference Documents

National Planning Policy Framework (July 2021)
The London Plan (March 2021)
Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012)
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)
Hillingdon Local Plan: Part 2 - Site Allocations (January 2020)
Accessible Hillingdon Supplementary Planning Document (September 2017)
Planning Obligations Supplementary Planning Document (July 2014)
Mayor's Good Practice Guide to Estate Regeneration (2018)
GLA Play and Informal Recreation (SPG) 2012;
GLA Housing (SPG) 2016;
GLA Affordable Housing Viability (SPG) 2017;
GLA - Mayor's Transport Strategy 2018;
GLA Draft Good Quality Homes for All Londoners SPG (October 2020).

Contact Officer: Neil Smith

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Notes:

 Site boundary

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Site Address:

Land at Austin Road

Planning Application Ref:

76550/APP/2021/4499

Planning Committee:

Major

Scale:

1:1,700

Date:

March 2022

LONDON BOROUGH OF HILLINGDON
Residents Services
Planning Section

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