

Report of the Head of Planning, Transportation and Regeneration

Address	LAND AT AVONDALE DRIVE HAYES
Development:	<p>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; new pedestrian and vehicular accesses; 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 Block A comprising 30 residential units (Class C3); new pedestrian access; associated amenity space and landscaping; cycle parking, refuse storage, and other associated infrastructure.</p> <p>Details: Comprising a maximum of 240 residential units in a series of buildings ranging in height from 2 to 10 storeys with associated access and car parking for 68 vehicles and 440 cycle parking, landscape and amenity areas and associated servicing.</p>
LBH Ref Nos:	76551/APP/2021/4502
Drawing Nos:	<p>Financial Viability Assessment Summary Report Avondale Drive Estate Circular Economy Appendix B WLC App Avondale Drive Estate Circular Economy and WLC Appendix Avondale Drive Estate Circular Economy and WLC statement Archaeological Desk-Based Assessment Cert C - Owner Address List 10.12.21. Existing Schedule Aviation Safeguarding Assessment - Issue 1-inc App Noise Statement with Appendices Noise Statement with Appendices ARBORICULTURAL IMPACT ASSESSMENT Covering Letter Fire Strategy - Outline Strategy Biodiversity survey and report EMERGENCE SURVEY RESULTS Statement of community involvement AVD Development Specification Statement Phasing Demolition & Construction Statement Planning statement GLA Carbon Reporting Spreadsheet Appendix A part 1 Appendix A part 2 Foul Sewage and Utilities Report Overheating Risk Assessment TVIA and tall building assessment Proposed housing mix Wind Microclimate Impact Assessment Outline Construction Logistics Plan Delivery and Servicing Plan Travel plan Daylight or Sunlight assessment</p>

Fire Strategy - Detailed Strategy
 Phase 1A Sections (Section A-A - East-West) AVD-PTE-P1A-ZZ-DR-A-10200-C4
 Phase 1A Sections (Section B-B - North-South) AVD-PTE-P1A-ZZ-DR-A-10200-C4
 Hardworks Plan Ph1A - Ground Floor AVD-TEP-P1-00-DR-L-90110 rev 0:
 Planting Plan Ph1A - Ground Floor AVD-TEP-P1-00-DR-L-90120 rev 0:
 Design & access statement
 Landscape Strategy Plan
 TOPOGRAPHICAL SURVEY Sheet 1 of 1
 SITE A - existing
 SITE B -- existing
 SITE - NORTH - existing
 SITE - WEST - existing
 Indicative Demolition Plan
 Indicative Phasing Plan
 Site Sections - Proposed.
 Phase 1A - Block Plan in Existing Context
 The location plan
 Geotechnical and Geo-environmental Desk Study Report Phase I Desk Study - Avondale Drive (Section 7)
 Phase I Desk Study - Avondale Drive (Section 3)
 Phase I Desk Study - Avondale Drive (Section 2)
 Phase I Desk Study - Avondale Drive (Section 4)
 Phase I Desk Study - Avondale Drive (Section 6)
 Phase I Desk Study - Avondale Drive (Section 5)
 Phase I Desk Study - Avondale Drive (Section 1)
 Landscape Management Plan
 Covering Letter
 Appendix B
 Landscape Strategy Plan
 Biometric plan
 Outline Energy Statement and Sustainability Strategy
 Transport Assessment
 Preliminary Ecological Appraisal
 SuDS Proforma
 Energy Statement
 Avondale Drive Estate Air Quality Assessment
 Flood risk assessment
 Drainage Strategy
 Phase 1A Proposed Elevations
 Parameter Plan 1 - Development Zones AVD- PTE- VD-XX-DR-A-10005-C:
 Parameter Plan 2 Building Heights AVD- PTE- VD-XX-DR-A-10006- C:
 Parameter Plan 3 Access and Movement AVD- PTE- VD-XX-DR-A-10007 C2
 Parameter Plan 4 Hard and Soft Landscaping AVD- PTE- VD-XX-DR-A 10008- C2
 Proposed Block Plan (within existing context) AVD-PTE-P1A-XX-DR-A 10010-C4
 Proposed Block Plan (within Masterplan context) AVD-PTE-P1A-XX-DR-A

10011-C3

Phase 1A Proposed Ground Floor Plan AVD-PTE-P1A-00-DR-A-10100-C3

Phase 1A Proposed First Floor Plan AVD-PTE-P1A-01-DR-A-10101-C3

Phase 1A Proposed Second Floor Plan AVD-PTE-P1A-02-DR-A-10102-C3

Phase 1A Proposed Third Floor Plan AVD-PTE-P1A-03-DR-A-10103-C3

Phase 1A Proposed Fourth Floor Plan AVD-PTE-P1A-04-DR-A-10104-C3

Phase 1A Proposed Roof Plan AVD-PTE-P1A-05-DR-A-10105-C3

Avondale Drive / West Elevation AVD-PTE-P1A-ZZ-DR-A-10301-C3

East / North Street Elevation AVD-PTE-P1A-ZZ-DR-A-10300-C3

Date Plans Received: 10/12/2021

Date(s) of Amendment(s): 10/12/2021

Date Application Valid: 17/12/2021

11/03/2022

1. SUMMARY

This is a 'hybrid' planning application; that is, one that seeks full (detailed) planning permission for Phase 1A and outline planning permission for the remainder of the site i.e Phases 1B and 2. This planning application comprises two parts:

1. A full application covering Phase 1A of the proposed development which is for 30 Social Rented homes; and,
2. An Outline application covering Phases 1B and 2 of the proposed development for a further 210 homes. Further details are to be submitted for approval at reserved matters stage.

Taken together these comprise a 'hybrid' planning application for a comprehensive residential led, mixed use development, involving phased demolition of all existing buildings to provide up to 240 new residential units, new publicly accessible open space, associated access, servicing, and landscaping, car and cycle parking.

The proposed development would be delivered in three phases. The first phase is predicted to commence in Autumn 2022, the second phase to commence in Spring 2023 with the final phase completed in Summer 2027 with completion of the development in Summer 2027.

The phases are set out as follows:

Phase 1A - This phase seeks detailed planning permission for a single building (Block A) which would accommodate 30 new homes with a GIA of 2,226 square metres at the western end of the site and is predicted to start in Autumn 2022 (subject to planning approval).

The remainder of the site is in outline form and predicted to be constructed in two further phases (Phase 1B and Phase 2) as follows:

Phase 1B - The second phase will involve the demolition of Wellings House, anticipated to commence in Spring 2023 and is anticipated to deliver 90 new homes.

Phase 2 - The final and largest phase for 120 homes is expected to start in Spring 2025 with completion of the entire development in Summer 2027. It would complete the regeneration on the site currently occupied by Fitzgerald and Glenister House

If outline planning permission is granted, 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 matters Access, Appearance, Landscaping, Layout and Scale reserved for future consideration (the reserved matters applications/RMAs). The Parameter Plans submitted do however set maximum criteria for heights, land uses, indicative layouts for Officers to consider which have been deemed to be acceptable, subject to the final detailed design.

The character of the local area is delineated by the surrounding green spaces, including Hitherbroom Park and Minet Country Park which is separated from the site by the A312 (The Park Way).

Housing developments built in the 1980's are located opposite the site on Avondale Drive and to the north of Hitherbroom Park, consisting of low-rise apartment buildings and houses. The wider area is predominantly pre/post-war two-storey semi-detached houses. There is a significant difference between the scale of the existing tower blocks and the more suburban scale of the houses and flats in the surrounding area. The tower blocks are a different typology and urban grain to their surroundings and stand out prominently within this part of the townscape and are seen in views over large distances.

The scale and massing of the proposed scheme has sought to better integrate the site and the surrounding context. The approach has been to optimise footprint in order to create a street scale architecture. The scheme provides a more readable datum height ranging between 5 and 8 storeys than the 13 storey tower blocks. This is a scale which people can associate and feel comfortable within. The changes in height also help to create variety within the streetscape and a more interesting skyline that will help it to better integrate with surrounding context.

The building heights along Avondale Drive street frontage have been kept lower at five-storeys to allow for a gradual rise in storey heights so that the slightly lower buildings opposite, which are three storeys plus a pitched roof, are not overwhelmed. The seven-storey height is proposed where the street frontage steps back to create pockets of public green space.

A building height of 8 and 10-storey is proposed fronting onto Hitherbroom Park and the green space along Abbotswood Way. The proposed 10-storey building will create more of a landmark which helps to signpost the new connection to Hitherbroom Park from Avondale Drive.

The site is not located within an area which has been designated as suitable for a tall building in locational terms. However the height of the proposed blocks would fall beneath the heights of the existing blocks on site. Technically the application would not 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 and other material planning considerations has been undertaken, as required by the London Plan, and this does fully justify the presence of tall buildings at this site. Taking into consideration the size, scale and arrangement of the existing 13-storey blocks, it is considered that the proposed buildings scale, location and massing would be a considerable improvement to the character and appearance of the streetscene. In summary, although there is a partial conflict the location element of the tall buildings policies, the proposals are considered to be acceptable on balance, taking into account the quality of design and tall building impacts.

The proposed development would have a slight deficit as regards Local Plan the provision of open space however this is addressed through a financial contribution towards off site

open space enhancements. Unit mix is affected by right to return and scheme viability so is marginally below the percentage of family units achieved on some other major development sites, but this is outweighed by the many other benefits of the proposals. In particular the principle of estate regeneration to deliver uplifts in affordable housing floorspace is strongly supported. The scheme proposed would provide a net gain of 96 housing units to the existing estate and provide 54.5% affordable housing by habitable room. Full redevelopment of the site also provides an opportunity for significant improvements to the quality of stock for a longer period of time, covering matters such as energy and sustainability performance of dwellings, as well as improved standards of living.

A number of planning obligations would be secured by Section 106 legal agreement and would contribute to the mitigation of any impacts that may arise from the proposed use. This includes a travel plan, a contribution towards a Parking Management Scheme Review, parking permit restriction and Active Travel Zone improvements. Subject to securing these measures, the proposal is considered acceptable with regard to its impact on the local highway network.

Overall, the scheme delivers significant benefits, particularly the delivery of high-quality, affordable homes and a layout that will create a safe and welcoming environment. The many positive benefits of the proposals articulated within the report 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:

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

i. Affordable Housing: Planning obligation for an on-site provision of 117 homes (equating to 8,760 sq m with 393 hr). 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 £3,716 is to be paid in relation to the detailed element and In terms of the OUTLINE element, subject to the submission of an updated AQA, damage costs shall be paid on a phase by phase basis, as identified by the updated Assessments. The Section 106 value due will be determined and secured at the detailed stage.

iii. Public Open Space: A financial contribution amounting to £128,000 shall be paid to the Council for the enhancement of existing public open space within the Council's administrative area.

iv. Highways Works: Section 278 agreement to secure highway works as follows:

v. Off-site Play Area - A financial contribution of £100,000 shall be paid to the Council for the provision of a replacement children's play area in Hitherbroom

Park at a size equivalent to that on the existing estate.

vi. Local Highways Improvements: The following shall be paid to the Council for the local highway improvements as set out below:

- The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act with the Council that obliges the applicant to enter fund those measure identified by the Active Travel Zone assessment at a cost of £120,000.

- The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act with the Council which obliges the applicant to pay the Council £50,000 for the implementation of parking restrictions should the development displace parking on-street as is anticipated.

vii. On site car club of up to 2 spaces, free membership for 3 years and £50 credit for one person per unit;

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

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

x. Employment Strategy and Construction Training: Details shall be in accordance with the Council Planning Obligations SPD with the requirement being for an in-kind scheme (on site) to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority.

xi. A Healthy Streets final sum to be confirmed following conclusion of discussions with GLA/TfL (no current sum stipulated in Stage 1 report);

xii 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.

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

xiv. 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, Emissions Reductions, Public Open Space, Highways Works, Highways Improvements, Travel Planning, Parking Permits, Employment Strategy and Construction Training, and Project Management and Monitoring). The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020); the adopted Planning Obligations Supplementary Planning Document (July 2014); Policy DF1 of the London Plan (March 2021); and paragraphs 54-57 of the National Planning Policy Framework (July 2021).'

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

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

In relation to the outline element:

Parameter Plan 1 - Development Zones AVD- PTE- VD-XX-DR-A-10005-C2
Parameter Plan 2 Building Heights AVD- PTE- VD-XX-DR-A-10006- C2
Parameter Plan 3 Access and Movement AVD- PTE- VD-XX-DR-A-10007-C2
Parameter Plan 4 Hard and Soft Landscaping AVD- PTE- VD-XX-DR-A-10008- C2

In relation to the detailed Phase 1 proposals:

Proposed Block Plan (within existing context) AVD-PTE-P1A-XX-DR-A-10010-C4
Proposed Block Plan (within Masterplan context) AVD-PTE-P1A-XX-DR-A-10011-C3
Phase 1A Proposed Ground Floor Plan AVD-PTE-P1A-00-DR-A-10100-C3
Phase 1A Proposed First Floor Plan AVD-PTE-P1A-01-DR-A-10101-C3
Phase 1A Proposed Second Floor Plan AVD-PTE-P1A-02-DR-A-10102-C3
Phase 1A Proposed Third Floor Plan AVD-PTE-P1A-03-DR-A-10103-C3
Phase 1A Proposed Fourth Floor Plan AVD-PTE-P1A-04-DR-A-10104-C3
Phase 1A Proposed Roof Plan AVD-PTE-P1A-05-DR-A-10105-C3
Avondale Drive / West Elevation AVD-PTE-P1A-ZZ-DR-A-10301-C3
East / North Street Elevation AVD-PTE-P1A-ZZ-DR-A-10300-C3
Phase 1A Sections (Section A-A - East-West) AVD-PTE-P1A-ZZ-DR-A-10200-C4
Phase 1A Sections (Section B-B - North-South) AVD-PTE-P1A-ZZ-DR-A-10200-C4
Hardworks Plan Ph1A - Ground Floor AVD-TEP-P1-00-DR-L-90110 rev 02
Planting Plan Ph1A - Ground Floor AVD-TEP-P1-00-DR-L-90120 rev 02

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

REASON

To ensure the development complies with the provisions Hillingdon Local Plan 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:

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 AVD-PTE-ZZ-XX-DR-A-10000-C3
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 - 2104170-02 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)
Daylight and Sunlight Report (including Overshadowing Assessment) (dated November 2021)
Delivery and Servicing Plan (dated December 2021)
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 30/11/2021
Overheating Risk Assessment (for Detailed First Phase) - (Avondale Drive - 29/11/2021)
Financial Viability Assessment - (December 2021)
Fire Strategy (Detailed Strategy) - (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 - Avondale Drive - (December 2021)
Transport Assessment - (dated 22/03/2022)
Framework Residential Travel Plan (dated November 2021)
Water Cycle Strategy (incorporated into Energy Statements and Drainage Strategy)
Drainage Strategy (Ref: P450729-WW-HT-XX-RP-C-0002 P3)
Flood Risk Assessment Ref : (P450729-WW-HT-XX-RP-C-0001 P4)
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 of development

The proposed land uses within the reserved matters (outline area) shall be strictly in accordance with the maximum floor area (Use Class C3 - 14,456 sqm GIA) up to 210 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 - 36%
Two bedroom units - 45%
Three and four bedroom units - 19%

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 OM9 Phasing of Development

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 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

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:

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. Avondale Drive Masterplan

- a. Background
- b. Design Principles
- c. Masterplan Layout
- d. Typical Development Blocks

4. Character Areas and Street Types

- a. Character and Approach
- b. Avondale Drive
- c. Abbotswood Way
- d. Park Street
- e. Park Edge
- f. Courtyard

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. 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 214 habitable rooms per hectare and 663 habitable rooms per hectare.

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).

10 A35 **Height**

No building or structure shall exceed 63 metres (AOD) in height in the outline element.

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 any relevant phase of this development commencing on site, 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 compliance with Policies DMHB 11, DMHB 14 and DMEI 1 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 RES7 Materials (Submission)

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

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

REASON

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

14 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).

15 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).

16 NONSC Social Rent units

The detailed element (Phase 1) of the development hereby approved shall ensure that 10% of the Social Rent units (comprising 7 x 1 bedroom 16 x 2 bedroom, 5 x 3 bedroom 2 x 4 person units) are constructed to accord with the technical specifications of Section M4(3)(2)(b) for a Wheelchair Accessible dwelling as set out in Approved Document M to the Building Regulations 2010 (2015 edition).

REASON

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

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

Prior to the commencement of above ground works of each phase of this development details of a landscape scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping

1.a Planting plans (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 and this schedule must include pollution absorbing trees. The scheme shall provide a minimum of 23 replacement trees.

2. Details of Hard Landscaping

2.a Refuse Storage

2.b Cycle Storage to show no less than 440 spaces and a further 7 short stay visitor spaces.

2.d Car Parking Layouts (including demonstration that 5% of all parking spaces are served by electrical charging points) to show 68 spaces with active electric vehicle charging points at 20% of all parking spaces with all the remainder having passive provision. The 68 spaces shall include 8 disabled bays.

2.e Hard Surfacing Materials

2.f External Lighting

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

3. Living Walls and Roofs

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

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

4. Details of Landscape Maintenance

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

4.b Proposals for the replacement of any tree, shrub, or area of 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).

18 RES10 Tree to be retained

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

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

REASON

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

19 RES2 Outline Reserved Matters

Details of the access, appearance, landscaping, layout, and scale, (hereinafter called the reserved matters) shall be submitted to the local planning authority before the expiry of three years from the date of this permission and approved in writing before any development begins. The submitted details shall also include details of:

(i) Any phasing for the development. The development shall be carried out in accordance with the approved details.

REASON To comply with Sections 91 and 92 of the Town and Country Planning Act 1990 (As Amended).

20 RES8 Tree Protection

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

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

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

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

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

- 2.a There shall be no changes in ground levels;
- 2.b No materials or plant shall be stored;
- 2.c No buildings or temporary buildings shall be erected or stationed.
- 2.d No materials or waste shall be burnt; and.
- 2.e No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

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

REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with

policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020)

21 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).

22 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).

23 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).

24 NONSC Noise (insulation)

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 - Strategic Policies (November 2012) in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

25 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 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 in accordance with Policy

EM8 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

26 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) 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)

27 NONSC Overheating Strategy

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

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

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

REASON

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

28 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:

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

The roof terrace and other public access areas are to be provided with lidded bins, and an approved method to maintain the accumulation of waste, to ensure that no food waste is available for the attraction of hazardous birds. The Bird Hazard Management Plan shall be implemented as approved on completion of the development and shall remain in force for the life of the building.

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. 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)

29 NONSC Flood Risk Assessment and Drainage Strategy

Prior to commencement 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 (November 2021) shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site by providing information on:

a) Sustainable Drainage features:

- i. Surface water discharge - the submitted drainage strategy must identify the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in Policy SI 13 of the London Plan (2021). Where the proposal does not utilise the most sustainable solution, justification must be provided. Any proposal that includes a connection to a private sewer network should provide details of the condition and ownership of the entire drainage route to a public sewer or ordinary watercourse.
- ii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that control water at source and provide wider biodiversity, water quality and amenity benefits.
- iii. Runoff rates - surface water discharge from the site must be no greater than greenfield runoff rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change.
- iv. Drainage calculations - include calculations to demonstrate that the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for events up to and including the critical 1 in 100 plus 40% climate change rainfall event.

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

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

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

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

c) Minimise water use.

i. incorporate water saving measures and equipment.

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

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

REASON

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

30 NONSC Contamination

(i) The development shall not commence until a scheme to deal with contamination in relation to any phase of the proposed development 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).

31 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).

32 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).

33 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 excising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 and to ensure the development provides a safe and secure environment in accordance with policy D11 of The London Plan 2021.

34 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 in consultation with the Health and Safety Executive. 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).

35 NONSC Lighting

Prior to the commencement of any superstructure works for each residential phase of development, details of any external lighting associated with 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.

REASON

In the interests of the appearance of the development and the amenity of neighbouring properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

36 NONSC PV's / Energy Strategy Phase 1

Detailed Phase 1 element

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 101% 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 Strategy outline phases

Prior to the commencement of all subsequent 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.

38 NONSC Whole Life Cycle

Prior to the occupation of each building 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.

39 NONSC Post Completion Report Whole Life Cycle

Prior to the occupation of any phase / development plot, 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.

40 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.

41 NONSC Energy Performance

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.

42 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 unless approved in writing by the Local Planning Authority.

REASON

To ensure a satisfactory external appearance in accordance with Policy DMHB 11 of the

Hillingdon Local Plan: Part 2 (2020).

43 NONSC CCTV

Prior to the occupation of any 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

and 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.

44 NONSC UGF

Prior to the commencement of above ground works of each 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 compliance with Policy G5 of the London Plan (2021).

45 NONSC Estate Management Regime

Prior to the occupation of each Development Plot or Phase 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).

46 NONSC Water capacity

No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

REASON:

Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

47 NONSC Air Quality Assessment

Prior to superstructure works of any relevant phase of this development, an Air Quality Assessment shall be submitted to and approved in writing by the Local Planning Authority. Any damage costs identified shall be submitted to the Local Planning Authority as a Discharge of the relevant planning obligation on a phase by phase basis. The development shall be implemented and maintained in accordance with the approved details.

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).

48 NONSC Demolition noise

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).

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.

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
DME 2	Employment Uses Outside of Designated Sites
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 9	Management of Flood Risk
DMH 1	Safeguarding Existing Housing
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
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
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP GG3	(2021) Creating a healthy city
LPP SD1	(2021) Opportunity Areas
LPP SD10	(2021) Strategic and local regeneration
LPP SI1	(2021) Improving air quality
LPP T7	(2021) Deliveries, servicing and construction
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF8	NPPF 2021 - Promoting healthy and safe communities
LLP D1	(2021) London's form character and capacity for growth
LPP D1	(2021) London's form, character and capacity for growth
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D14	(2021) Noise
LPP D2	(2021) Infrastructure requirements for sustainable densities
LPP D3	(2021) Optimising site capacity through the design-led approach

LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G5	(2021) Urban greening
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 H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP H8	(2021) Loss of existing housing and estate redevelopment
LPP S4	(2021) Play and informal recreation
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI6	(2021) Digital connectivity infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP T1	(2021) Strategic approach to transport
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
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 4	NPPF-4 2018 - Decision-making
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - 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 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)

6

The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

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.

7 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)

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

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

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

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

9

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.

10

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 1.04 hectares and accommodates the existing Avondale Drive Estate. The estate consists of three 13-storey blocks of flats, each containing 48 flats (total 144 homes). Between each tower are large covered car parking areas. To the west of the blocks is an area of single storey garages and additional car parking. In total, there are an estimated 88 existing car parking spaces together with a block of 24 garages on the estate. All existing dwellings are two-bedroom flats. The blocks were constructed in the late 1960's using a large panel system.

The Estate is bound by Avondale Drive to the south and Abbotswood Way to the east. Pedestrian access is provided onto Abbotswood Way from the estate. Both pedestrian and vehicular access is provided onto Avondale Drive to the south. Minet Junior School is located directly to the west, directly to the north of the estate is Hitherboom Park, which forms part of a Site of Nature Conservation Importance (Borough Grade 1). To the south of the estate is low rise, predominately 2 and 3 storey traditional housing.

Beyond Abbotswood Way to the east is the A321, the River Crane and then Minet Country Park. The A312 connects to the A40 and the M4, both of which provide access to the M25. Pedestrian and cycle access is provided to Minet Country Park (0.1 miles from the site) via an underpass which passes under the A321. The estate is approximately 0.4 miles due north-east of Hayes Town Centre.

Hayes & Harlington station is approximately 1 mile to the south-west of the estate, with direct services to London Paddington, Heathrow Airport and Reading. It is also situated on

the Crossrail route, which once completed will provide 10 services per hour facilitating direct travel to Essex and central and southeast London.

The site has a PTAL score 1B, indicating low public transport connectivity, although the site benefits from a well-connected bus network along Coldharbour Lane to the west, which provides regular services to Hayes Town Centre and associated services including Hayes and Harlington Railway Station. A segregated off road pedestrian and cycle route runs from the west of the estate, via the Grand Union Canal, and into Hayes Town Centre.

There are no local or statutory listed buildings within the site or in the surrounding area. There are sporadic trees around the boundary of the estate. Some of these provide significant amenity value. None of the trees on the estate or in the surrounding are subject to Tree Preservation Orders.

3.2 Proposed Scheme

The proposals involve the phased demolition of the estate to provide new affordable (and private sale) homes within a regenerated estate environment. The emerging proposals seek to provide up to 240 residential dwellings along with new public open space, improved pedestrian and cycling connectivity, and new and improved landscaping and public realm. The proposed development comprises a series of seven residential blocks ranging from 2 to 10 storeys in height.

The application is in hybrid form with Phase 1A being a detailed element of 30 new homes with the remaining 210 homes being in outline form.

Detailed first phase

The first phase will deliver 30 new homes all of which will be Social Rent units as the fixed provision to come forward for Block A at 5 storeys, which forms part of the 240 unit total for the scheme. The building will be 5 storeys in height and will occupy land which is currently a series of car parking spaces and single storey garages and can be constructed without the need to demolish any of the existing homes on the estate.

The dwelling mix is set as follows:

1 bed - 7 homes (23%)
2 bed - 16 homes (53%)
3 bed - 5 homes (17%)
4 bed - 2 homes (7%)

Total - 30 homes

Outline Masterplan

The Outline element of the site, which encompasses the remainder of the site, is predicted to deliver a further 210 homes in two phases (1b and 2) in a series of 7 buildings (Blocks B to H) in tow development zones as follows:

Phase 1B

Block B - 29 Homes
Block C - 30 homes

Block D - 31 Homes

Phase 2

Block E - 37 Homes

Block F - 22 Homes

Block G - 36 Homes

Block H - 25 Homes

The seven buildings B to H vary in height between 5 - 10 storeys. The tallest 10 storey element is positioned in the north eastern corner of the site, where massing would be at the furthest point away from the existing residential properties along Avondale Drive to the South and the Minet Infant School to the north west.

The proposed heights of each building are proposed as follows:

Block B - 53.8m (up to 7 storeys)

Block C - 47.8m (up to 5 storeys)

Block D - 53.8m (up to 7 storeys)

Block E - 63m (up to 10 storeys)

Block F - 47.8m (up to 5 storeys)

Block G - 63m (up to 10 storeys)

Block H - 57m (up to 8 storeys)

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

One bedroom units - 36%

Two bedroom units - 45%

Three and four bedroom units - 19%

Car and Cycle parking

In terms of car parking provision, 68 car parking spaces are proposed as part of the regeneration of the estate. The spaces are located at ground level beneath podium areas serving the residential blocks and some along the estate streets including 8 disabled bays. Active electric vehicle charging infrastructure will be provided for 20% parking spaces which equates to 0.34 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 440 no. long-stay spaces will be provided for future and returning residents as well as 7 no. short-stay spaces for visitors. There will be 57 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/2021/2590 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.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:

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
DME 2 Employment Uses Outside of Designated Sites
DMEI 1 Living Walls and Roofs and Onsite Vegetation
DMEI 10 Water Management, Efficiency and Quality
DMEI 14 Air Quality
DMEI 2 Reducing Carbon Emissions
DMEI 9 Management of Flood Risk
DMH 1 Safeguarding Existing Housing
DMH 2 Housing Mix
DMH 7 Provision of Affordable Housing
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
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP GG3	(2021) Creating a healthy city
LPP SD1	(2021) Opportunity Areas
LPP SD10	(2021) Strategic and local regeneration
LPP SI1	(2021) Improving air quality
LPP T7	(2021) Deliveries, servicing and construction
NPPF- 5	NPPF-5 2018 - Delivering a sufficient supply of homes
NPPF11	NPPF 2021 - Making effective use of land
NPPF12	NPPF 2021 - Achieving well-designed places
NPPF14	NPPF 2021 - Meeting the challenge of climate change flooding
NPPF2	NPPF 2021 - Achieving sustainable development
NPPF8	NPPF 2021 - Promoting healthy and safe communities
LLP D1	(2021) London's form character and capacity for growth
LPP D1	(2021) London's form, character and capacity for growth
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D14	(2021) Noise
LPP D2	(2021) Infrastructure requirements for sustainable densities
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings

LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP G5	(2021) Urban greening
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 H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP H8	(2021) Loss of existing housing and estate redevelopment
LPP S4	(2021) Play and informal recreation
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI6	(2021) Digital connectivity infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP T1	(2021) Strategic approach to transport
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
NPPF- 11	NPPF-11 2018 - Making effective use of land
NPPF- 12	NPPF-12 2018 - Achieving well-designed places
NPPF- 14	NPPF-14 2018 - Meeting the challenge of climate change, flooding and coastal change
NPPF- 15	NPPF-15 2018 - Conserving and enhancing the natural environment
NPPF- 2	NPPF-2 2018 - Achieving sustainable development
NPPF- 4	NPPF-4 2018 - Decision-making
NPPF- 8	NPPF-8 2018 - Promoting healthy and safe communities
NPPF- 9	NPPF-9 2018 - 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 650 owner/occupiers of neighbouring properties as well as owner/ occupiers within the application site were directly notified by letter.

Seven written responses were received. The neighbour representations and objections made in respect of the proposals are as follows:

There are already too many flats in the area and this will exacerbate further congestion problems; There are significant traffic congestion problems at school drop off and pick up times as the site is adjacent to Minet School and close to Guru Nanak School and this proposal will lead to further congestion.

The pavements are not wide enough to cater for the development.

There are too many affordable units and there should be 75-80% market sale homes.

There is a lack of car parking for the number of flats proposed.

The proposals will lead to an increase in crime which the area currently suffers from.

There should not be any trees felled.

There will be disturbance due to noise, dust and general disturbance during the construction and demolition periods.

Following an amendment to the scheme a further resident has raised objection in relation to noise dust and general disturbance resulting from demolition and building works.

PLANNING OFFICER COMMENT

Congestion, traffic impact and parking issues are discussed at Section 7.10 of this Report.

The impact on the amenities and living conditions of the proposal are examined at Section 7.09 of this Report.

Provision of affordable dwelling is discussed at Section 7.13.

Crime is discussed at Section 7.22.

HISTORIC ENGLAND (Summary)

No Objection.

NATS

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

HEATHROW AIRPORT

The proposed detailed part of this hybrid application relating to Buildings A 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:

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.

THAMES WATER

Waste Comments

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

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above

recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

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.

Water Comments

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

Supplementary Comments

Wastewater: Currently the surface water is proposed to discharge at QBar equalling 4.3l/s, with foul water unrestricted. Overall a betterment will be achieved 2l/s down manhole ref 6201 and 2.3 down manhole ref 7201.

Need more specific information on Foul. Can you please provide Thames Water with the following;

- Discharge locations i.e. manhole ref
- Discharge type i.e. gravity or pump
- discharge equivalent i.e. property types

OFFICER COMMENT

Subsequent to the receipt of this information the have applicant team have received written confirmation from Thames Water dated February 2022 than there is adequate capacity to serve the proposed development.

NATURAL ENGLAND (Summary)

Natural England has no comments to make on this application.

LONDON FIRE BRIGADE (1st Comments)

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.

LONDON FIRE BRIGADE (2nd Comments)

No further observations.

PLANNING OFFICER COMMENT

The application included a detailed fire safety strategy report.

The applicant responded to London Fire Brigade's initial comments with a detailed response that included confirming that a dry riser will be provided in all blocks, with fire service access to within 18m of the dry riser inlet provided via Avondale Drive and Abbottswood Way, both of which are through roads with no turning required. Together with further comments and classifications the London Fire Brigade were then re-consulted on this basis. They have advised they now have no further observations (Note: If they have an objection, this is normally specified in 2nd referral responses). Officers consider that the proposals are in compliance with Policy D12 of the London Plan, subject to the imposition of a condition relating to the submission of a further Fire Strategy.

HEALTH AND SAFETY EXECUTIVE

Outline permission

Regarding the first part of the hybrid application for outline permission which covers Phase 1B and Phase 2 (all matters reserved), it is noted there is commitment to adhere to fire safety standards within the fire strategy which states: "This fire strategy does not provide a detailed assessment but makes assumptions and provides guiding principles on the basis of the illustrative masterplan to inform the fire safety considerations of the detailed design of these future phases, which will need to be documented as part of Reserved Matters Applications". However, as there are no plan drawings available at this stage, HSE is unable to provide a comment for this part. Should the Local Planning Authority be minded to grant outline planning permission, we strongly recommend the following:

'The outline planning permission is subject to a suitable condition requiring the submission of a satisfactory fire statement in respect of the whole development (Phase 1A, Phase 1B and Phase 2) with any reserved matters application, and that HSE is consulted in conjunction with the Local Planning Authority's consideration of any reserved matters application.'

This would ensure the purpose of HSE being made a statutory consultee for such applications is achieved. It is recommended that the applicant uses the fire statement form (or a form to similar effect) available on gov.uk to provide the fire safety information.

Full planning permission

Regarding the second part of this hybrid application for full planning permission for Block A, Phase 1A (5 storeys), HSE has no comment to make at this stage due to the limited information available in relation to the vicinity building, in the curtilage of the development. However, Block A will need to be re-considered, through a subsequent consultation request, with the submission of a satisfactory fire statement.

PLANNING OFFICER COMMENT

HSE in stating 'no plan drawings' are referring to the fact that the detailed layout/plans are a reserved matter for most of the blocks proposed. They accept use of a condition to require a further fire strategy be submitted.

A suitable planning condition in relation to the submission of a Fire Strategy is recommended to be attached to any planning permission as suggested.

NATIONAL HIGHWAYS

Referring to the full planning application dated 21st December 2021 referenced above, notice is hereby given that Highways England's formal recommendation is that we:

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 Hayes Town Centre 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 Avondale Drive Estate, three 13-storey blocks of flats, each containing 48 flats (a total of 144 homes). Between each tower are large, covered car parking areas and to the west of the residential blocks is an area of garage blocks and additional surface level car parking, comprising a total of 98 parking spaces on site. The proposed development is for the phased demolition of the estate and replacement with 240 residential dwellings, an uplift of 96 units. The application comprises delivery of 30 units in the first phase, with the remaining 210 units to be delivered in subsequent phases. The proposed development will include re-provision of 68 car parking spaces on site, though in a worst case scenario there is a potential for overspill of up to 74 vehicles onto surrounding streets.

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 as well as private vehicle trip rates split between affordable and private homes. The proposed trip generation uses the same methodology, calculating person and vehicle trips for an additional 96 private tenure units 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. However, as best practice, a comparative assessment should also be undertaken by applying local mode shares derived from 2011 Census data to person trip rates and calculating the numbers of trips by differing modes of travel, including private vehicles. Overall forecasts for the development indicate a total of 57 two way private vehicle trips in the AM peak and 43 trips in the PM peak, excluding vehicle deliveries. These levels of trips are 13 and 15 trips above the respective number of AM and PM peak trip generation for the existing site use. Vehicle delivery and servicing trips have not been forecasted, 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, which it justifies due to the small net increase in numbers of vehicle trips.

Given the absence of a current controlled parking zone (CPZ) in the immediate surrounding area, and the spare on-street parking capacity identified in the parking stress survey, National Highways considers further information should be provided as to how the use of private vehicles will be managed to ensure the net increase remains small. National Highways considers that given the good accessibility of the site by public transport, Hillingdon should consider introducing parking controls to ensure all new residential units provided as part of the scheme are car free, in order to limit any future impact on the local road network (LRN) and SRN. We note, however, that all additional units provided as a result of this development will be for private tenure, rather than affordable units. Trip rates presented in Table 7.1 indicate that this type of tenure would be expected to result in ~1/4 of the number of vehicle trips compared to affordable tenure units, reducing the risk of excessive numbers of additional private vehicle trips. We also note the proposals to provide 3 car club spaces on site and the early engagement with a car club operator to support a reduction in vehicle trips.

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 some concerns regarding the management of the use of private vehicles at the site, and have identified gaps in the information provided within the TA, given the scale of the proposed increase in private vehicle trips compared to the extant land uses on site, and the potential to further mitigate any increases, 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).

Recommendation

National Highways raises no objections.

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 this 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 worsen over the years of construction owing to likely limited investment are due impending demolition and a likely raise 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.

GREATER LONDON AUTHORITY

The 1.07 hectare site is located in Hayes falling within the Hayes Town Centre housing zone. It is bounded by school fields and Hitherbroom Park to its north, Avondale Drive to its south, Abbottswood Way to its east and existing development to its west. Avondale Drive provides access to Coldharbour Lane to the west of the site. The estate includes three 13-storey blocks of flats, each containing 48 two-bedroom units. Covered car parking areas are located between each building. The site is located within the Hayes Housing Zone, under LB Hillingdon LPP2 Policies Map (2020).

The existing estate includes one, two and three-bedroom units within the following tenures:

- Affordable/social rented: 116
- Housing association rented: 5
- Resident homeowners (leasehold): 8
- Non-resident homeowners: 15

Recommendation

That Hillingdon Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 77. Possible remedies set out in this report could address these deficiencies.

The nearest part of the Transport for London Road Network (TLRN) is A312 (The Parkway), which lies approximately 50 metres to the eastern edge of the application site. There are three bus routes serving the site with the nearest bus stop on Avondale Drive. The nearest rail station is Hayes & Harlington, at approximately 1.6 kilometres to the south of the site. The walking distance to this station exceeds the maximum (960m) used for PTAL calculations. However, it is noted that all three bus routes serving the site provide a direct link to the station. Consequently, the site achieves a public transport access level (PTAL) of 2, on a scale of 0 to 6b, where 6b represents the most accessible locations.

Details of this proposal

Hybrid planning application seeking outline consent for the demolition of existing buildings and redevelopment of the site to provide 210 new homes across 7 blocks alongside associated infrastructure. The outline element would range in height between 5-10 storeys.

Full planning permission for 30 new homes (100% affordable) in a single block, associated amenity space, landscaping and other associated infrastructure. The detailed element would be a maximum of 5-storeys.

Case history

In August and October 2021 the GLA held a pre-application meeting with the applicant to discuss the redevelopment of the site. It was advised that the principle of the proposed estate regeneration was

supported. Noting the minor uplift in replacement social rented floorspace, the applicant was advised that the proposal would result in a loss of social rented habitable rooms and units. Officers considered (at this time) the loss of 91 social-rented habitable rooms to be significant, and further detail was required in terms of the required decant and right of return of existing residents. The proposal would not deliver an uplift in affordable housing as sought by London Plan. Further viability discussions were required and the availability of GLA grant funding it was advised should be explored. Comments regarding transport, sustainable development and the environment were issued with the advice that they should be addressed within any future application.

Strategic planning issues and relevant policies and guidance

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Hillingdon Local Plan Part 1: Strategic Policies (2012), Local Plan Part 2: Development Management Policies (2020), Local Plan Part 2: Site Allocations and Designations (2020); and, the London Plan 2021.

The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- The National Design Guide;
- The National Model Design Code; and,
- The Good Practice Guide to Estate Regeneration.

The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- Opportunity Area London Plan;
- Town Centre London Plan;
- Housing London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG;
- Affordable housing London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
- Reprovision of housing London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Affordable Housing and Viability SPG;
- Urban design London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG; Optimising Site Capacity: A Design-led Approach draft LPG; Fire Safety draft LPG;
- Inclusive access London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;
- Transport and parking London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG;
- Sustainable development London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance LPG; Urban Greening Factor draft LPG; London Environment Strategy;
- Air quality London Plan; the London Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air Quality Neutral draft LPG; and,
- Equality London Plan, the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG.
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found here.

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 144 existing homes and provision of 240 new homes (210 within the outline scheme and 30 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 currently comprises; 116 affordable/social rented homes, 5 housing association rented, 8 resident homeowners (leasehold) and 15 non-resident homeowners. The applicant has confirmed that all of the existing affordable / social rent households who have chosen to exercise their right to return would be provided with a replacement home on the estate. The delivery of 117 Social Rent Replacement Homes proposed as part of the scheme will facilitate the decant of these returning residents from their existing homes into new homes phased across the estate. Existing resident leaseholders are entitled to a shared equity offer to make buying one of the new homes on site affordable for them. In accordance with the compensation code leaseholders are entitled to the full market value of their home plus 10% and reasonable costs. This forms their equity share of the shared equity home and the council retains the remaining equity, charging no rent on it. 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 that as part of the application modelling several scenarios were tested including; refurbishment of the existing estate, partial redevelopment and full redevelopment. The appraisal of the existing accommodation confirmed that the existing homes fail to perform well against environmental performance indicators, space standards, accessibility and quality of living environments. The wholesale redevelopment of the site allows for these deficiencies to be addressed as part of a street-based masterplan which would improve public realm and passive surveillance. The justification for demolition of the existing buildings and redevelopment of the estate also includes making the most efficient use of land and providing an uplift in housing numbers and quality. The principle of this is broadly supported in strategic planning terms 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. The application documents confirm that, the existing site comprises 121 affordable (social rent) units which equates to 484 habitable rooms. These proposals would realise 54.5% affordable housing (by habitable room) across the whole masterplan delivering an uplift of 1,005 sq.m. of social rented floorspace. In terms of housing units, the scheme would deliver 117 social rent replacement units (equating to 393 habitable rooms). This would represent a reduction of 91 habitable rooms and 4 units compared to the existing estate (which has arisen as a result of the need to provide for enhanced living areas which better respond to space standards). Nevertheless, on that basis that the replacement social rent floorspace would generate an uplift of 1,005 sq.m. the proposal is acceptable in line with London Plan Policy H8. Notwithstanding this, the Council should ensure that the decant process is managed carefully in response to the relative reduction in social rent units and habitable rooms, and that social tenants have a full right of return (refer below). It is noted that the affordable housing offer would ensure 113% social rent replacement on a floorspace basis. This must be robustly secured as part of any future planning permission. Unit status Tenure Unit no, floorspace and habitable room

Table 1: Existing vs proposed scenarios Existing homes

Affordable/social rent -121 units (7,755 sq.m. & 484 habitable rooms)

Private leasehold - 23 units (1,723 sq.m 92 habitable rooms)

Proposed homes

Social Rent Replacement Homes - 117 units (8,760 sq.m &.393 habitable rooms)

Private - 123 units (7,922 sq.m. & 327 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 set out above the existing site comprises 144 homes (121 social rent and 23 private leasehold). The proposed scheme would provide 54.5% 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.

Full right of return for social tenants

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, the consultation spas back to July 2020 were a telephone survey with existing residents was undertaken and public consultation events in August and October of 2020. Remote consultation events were held through late 2020 and the early part of 2021 which included 'Zoom' meetings. Between April and May 2021 held a residents ballot. All eligible residents were able to vote 'yes' or 'no' to the regeneration proposals. 85% of residents participated with 94% of participants voting in favour of the redevelopment.

Land use principles conclusion

The principle of estate regeneration to deliver uplifts in affordable housing floorspace is strongly supported. The scheme proposed would provide a net gain of 96 housing units to the existing estate and provide 54.5% affordable housing by habitable room.

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 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 homes. 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 should 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.

Table 2: Proposed housing mix *(Habitable room)
Housing Unit size

Social rent replacement - 1 bedroom 29 (58)
Market - 56 (112)
Total 85 (170)

2 bedroom

Social rent replacement - 55 (165)
Market - 60 (180)
Total 115 (345)

3 bedroom
Social rent replacement - 28 (140)
Market - 7 (35)
Total 35 (175)

4 bedroom
Social rent replacement - 5 (30)
Total - 5 (30)

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 30 new homes, 100% 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 54.5% affordable housing, with all of the affordable units proposed as social rent replacement homes.

The scheme is re-providing the existing social rented floorspace (and providing an uplift of 1,005 sq.m.) 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.

Unit 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 23% of the units as 1-bedroom homes, 53% as 2-bedroom, 17% of the units will be 3-bedroom and 7% would be 4-bedroom homes all of which will be within the affordable tenures. For the outline element the applicant is proposing an indicative mix of 37% of the units as 1-bedroom homes, 47% as 2-bedroom, 14% of the units will be 3-bedroom and 2% 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 both the detailed and outline element of the scheme there would be a requirement for 1,289.4 sq.m. The application documents confirm that the site would provide a total of 994 sq.m. The Council must secure the details and quality of the proposed playspaces as part of any future planning permission, ensure that the detailed element of the scheme makes suitable play space 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. Where it is not possible to accommodate the required play space provision on site the Council should secure a payment towards the upgrade of local open space.

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 224 units per hectare once both the detailed and outline elements of the scheme are delivered. The site sits in a semi-urban setting, in close proximity to a district town centre. 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

As shown in figure 1 below, the masterplan is set out in a series of linear blocks which broadly mirrors the existing arrangement on site. Existing pedestrian routes through and around the site have been optimised and new routes have been introduced north/south and from within the site to areas of open space. The detailed component comprising Block A is located in the northern portion of the site and arranged around an internalised courtyard. The building has been positioned to ensure a circa. 30 metre set back from the adjacent primary school and allow for minimum separation distances of 21 metres from the outline element of the masterplan. The general arrangement of the site is 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 the detailed phase of the proposals would not meet the definition of tall buildings under the definition set out in Policy D9, consisting of only 5 storeys. However, several elements of the outline element of the scheme would exceed the 6-storey height threshold with buildings proposed to range between 8-10 storeys at the tallest elements (shown below).

The detailed element of the scheme would comprise block A and would be 5 storeys in height. The outline element of the scheme at blocks B-H are proposed to range in height between 2-10 storeys, the tallest element of the scheme at 10-storeys is located furthest from low rise residential and on to open space. With respect to the existing context in relation to tall buildings it is noted the blocks currently on site are equivalent to 13-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 not located within an area which has been designated as suitable for a tall building in locational terms. However, GLA officers note that the height of the proposed blocks would fall beneath the heights of the existing blocks on site. The proposals have been arrived at through collaborative discussions with the borough through the pre-application process. GLA officers note that the application would not 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 and other material considerations could justify the presence of a tall building at this site. 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 below have been appropriately addressed.

The visual impact of the tower is considered to be acceptable, taking into account the existing baseline and 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 as demonstrated in the submitted TVIA in some local views the proposed height and massing would have reduced impact in comparison to the existing blocks. 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 particularly in relation to the outline element.

In summary the development includes tall buildings that depart from 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.

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 Good Quality Housing. 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 the masterplan would achieve 68% of the homes would be dual aspect, where there are single aspect units, none of these are family sized and none would be north-facing. All blocks would meet or exceed space standards. 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 with a prevailing red-brown multi-stock brick with a white colour mortar for the main body of the building with areas of glazing and claret balustrades to the balconies. 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 3% of the dwellings have been designed to comply with Building Regulations requirement Part M4(3), whilst the remaining 97% have been designed to comply with Building Regulations requirement Part M4(2). Whilst this is beneath the targets outlined in the London Plan the applicant has confirmed that when viewed across the masterplan as a whole the scheme will achieve 10% M4(3) standards with the remaining units meeting M4(2) criteria. The Council must secure M4(2) and M4(3) requirements by condition as part of any permission for both the detailed and outline elements of the scheme.

Transport

Public transport impacts and healthy streets

With regards to the trip generation and impacts, clarification on the trip rates and adjusted modal split applied in the proposed development trip generation analysis is sought. The multimodal trip rates appear to be higher than expected for this scale of development, which questions the suitability of the TRICS comparator sites selected to derive the trip rates. The adjusted modal split for cars (9 per cent) do not reflect the level of parking for the proposed development and as such it is disputed. Once this has been clarified a contribution towards the healthy streets objectives for Bulls Bridge Junction may be sought. a package of healthy streets improvements should be secured by the Council to address issues identified by the ATZ assessment. This would need to be secured by Section 106 Agreement.

Highway impacts

The proposal includes a series of vehicular access points in Avondale Drive and Abottswood Way. No vehicular access is provided for the detailed application (Block A) because it does not include any off-street car parking. The vehicular access arrangements are generally acceptable, but it is expected that the details of vehicular access points will be provided as part of the reserved matters applications. The applicant should demonstrate that the proposed access is acceptable in highway safety terms. The proposed public realm improvements along Avondale Drive, including improvements to on-street parking, is welcomed. Such improvements fall within the scope of a Section 278 Agreement, which should be secured in relation to highway improvements in Avondale Drive and Abbottswood Way.

Car parking

The detailed phase of the development would be car free other than the provision of 2 blue badge parking spaces are provided on-street in Avondale Road. This accords with London Plan Policy T6.1 which requires 3% provision from the outset. The applicant is required to demonstrate where an additional 7% blue badge parking will be provided as and when demand arises.

80 car parking spaces are provided across the wider site and outline element for the scheme. The proposed parking equates to 0.28 per residential unit. While this is lower than the maximum set out in London Plan Policy T6, the lack of parking controls in the surrounding streets suggest that residents with no allocated off-street parking are free to park on-street, and are therefore not prevented from owning cars. The car parking demand could be much greater than the parking provision. Notwithstanding the provision of car club spaces, a permit-free agreement to prevent new residents from obtaining permits to park in a future CPZ should be secured as part of the planning consent.

All parking should be monitored, managed and enforced through a Parking Design and Management Plan (PDMP) 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.

Cycle parking

The cycle parking provision for the detailed phase would provide 56 long-stay and 2 visitor cycle parking spaces. This accords with the requirements of London Plan Policy T5. The cycle store is provided at ground level and appears to include provision for non-standard bicycles in accordance with LCDS guidance. Short-stay spaces for visitors will be provided in the public realm. The intention to provide policy-compliant cycle parking in secure cycle stores at ground floor for the outline part of the application is welcomed. Cycle parking must be secured by condition for both the detailed and outline elements of the scheme.

Travel planning, deliveries and servicing and construction logistics

A full Travel Plan should be secured through the Section 106 agreement. A Delivery and Service Plan setting out the strategy for servicing, was submitted. Servicing and deliveries will be accommodated on-street in Avondale Road and Abbottswood Road and off-street within the new internal service road which wraps around Block E. No formal on-street servicing bays are proposed. London Plan Policy T7 discourages such provision. The final DSP should be secured by condition and include consideration of management of home deliveries. A Construction Logistics Plan (CLP) 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.

Transport conclusion

The applicant must address issues in respect to the proposed multimodal trip rates, adjusted modal split applied in the trip generation analysis. The Council must appropriately secure a contribution towards the Healthy Streets Improvement Project (A312 Bulls Bridge Junction), permit free agreement, details of cycle parking, S278 Agreement, parking design and management plan, construction logistics, Delivery and servicing and travel plan should all be secured by condition or through the section 106 agreement.

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 101%. 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 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 (The applicant needs to provide the WLC Assessment for the outline part of the proposal). 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 Council must agree and secure the proposed strategy. 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.

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 0.4 across the completed masterplan, this meets the target of 0.4. The Council must secure all greening measures to ensure the target is met for both elements of the scheme.

Sustainable drainage and flood risk

The submitted flood risk assessment does not comply with London Plan Policy SI.12, as it does not give appropriate regard to the risk of pluvial flooding, this must be addressed. The surface water drainage strategy for the proposed development does not currently comply with London Plan Policy SI.13, as insufficient information has been provided to allow for a full assessment. The applicant must make additional submissions in respect to green roofs, permeable paving, hydraulic calculations and exceedance flood flow routes. The proposed development generally meets the requirements of London Plan Policy SI.5. The Applicant should also consider water harvesting and reuse to reduce consumption of water across the site. This could be integrated with the surface water drainage system to provide a dual benefit.

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 an air quality management 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.

Local planning authority's position

Hillingdon Council planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in March.

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 estate regeneration, housing, affordable housing, urban design, transport and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not currently comply with these policies, as summarised below:

- Land Use principles: The principle of estate regeneration to deliver uplifts in affordable housing floorspace is strongly supported. The scheme proposed would provide a net gain of 96 housing units to the existing estate and provide 54.5% affordable housing by habitable room.
- Housing: The re-provision of affordable units and uplift of 240 new homes is strongly supported. The applicant is proposing 54.5% affordable housing (by floorspace) across the masterplan. The Council must robustly secure this offer and all relevant affordability criteria. Following conclusion of the viability review process early and late stage reviews should be secured.
- 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 multimodal trip rates, adjusted modal split applied in the trip generation analysis. The Council must appropriately secure a contribution towards the Healthy Streets Improvement Project (A312 Bulls Bridge Junction), permit free agreement, details of cycle parking, S278 Agreement, parking design and management plan, construction logistics, Delivery and servicing and travel plan should all be secured by condition or through the section 106 agreement.
- Sustainable development: Further information and clarification is required on the sustainable development Strategies before compliance with the London Plan can be confirmed.

PLANNING OFFICER COMMENTS

Since the issue of this Stage 1 Report the application proposals have been amended to delete the 14 on-street car parking spaces which the applicants initially resented as part of the proposal. This is discussed further in Section 7.10.

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.

Internal Consultees

WASTE AND REFUSE TEAM

Overall the Waste & Refuse looks adequate.

It should be noted that: The enclosure or chamber should be large enough to allow clearance of 150 mm between each bin and the walls. There should be space in front of the bins to allow residents to easily access the bins when depositing waste. If many multiple bins are used then there should be sufficient space to rotate the bins in between collections. The walls should be made from an impervious, non-combustible material that ideally has a fire resistance of one hour when tested to BS 476-21.

If a gate or door is added to the enclosure or chamber it should be metal, hardwood or softwood clad with metal. Ideally it should have a fire resistance of 30 minutes when tested to BS 476-22. The door frame should allow clearance of 150 mm either side of the bin, when it is being pulled out for collection. The door frame should be rebated into the reveals of the opening. There should be a latch or clasp to hold the gate / door open while the collection process takes place. The doors should fully open. For hygiene arrangements should be made for the cleansing of the bin stores with water and disinfectant. A hose union tap should be installed for the water supply.

Drainage should be by means of trapped gully connected to the foul sewer. The floor of the bin store area should have a suitable fall (no greater than 1:20) towards the drainage points. If the chambers are inside the building they should have a light. The lighting should be a sealed bulkhead fitting (housings rated to IP65 in BS EN 60529:1992) Internal bin chambers should have appropriate passive ventilators to allow air flow and stop the build up of unpleasant odours. The ventilation needs to be fly and vermin proofed and either near to roof or floor, but away from the windows of dwellings

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

PLANNING OFFICER COMMENT

Officers note the response and conditions in relation to the provision of refuse store are attached where appropriate.

TREES AND LANDSCAPING TEAM

This site is occupied by Council-owned flats, with associated amenity space and parking, located to the north of Hayes Town Centre, located on the north side of Avondale Drive (east end). The northern perimeter is bounded by the playing fields of Minet Junior School and Hitherbroom Park, with residential streets to the south. Minet Country Park lies to the east beyond the Hayes By-Pass.

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 enhanced by selected trees and the access to open spaces outside the site.

Background

This hybrid outline application follows the submission of pre-application ref. 76551/PRC/2021/154. 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 33 trees and 3 groups, in accordance with BS5837:2012. There are 2 x A grade trees (highest quality), 22 x B grade trees (moderate /worthy of retention on development sites), 9 C grade trees/groups (lower quality) and 3 U grade (very poor). The report includes a tree survey and retention plans.

Table 5.1 confirms that the Detailed Phase 1 application will require the removal of 6 trees to enable the development, including 3 x B grade specimens. Table 5.2 confirms that the Outline / Phases 1B and 2 applications will result in the loss of a further 22 trees, including 2 x A and 13 x B grade specimens. The tree impacts will need to be reviewed and re-assessed as they come forward under the Reserved Matters.

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 17 new trees will be planted in Phase 1 by way of mitigation for those to be removed, while in Phases 2-5 over 50 trees will be planted compared to those sacrificed to the development.

An amenity and play space strategy is outlined for the masterplan, together with off-site enhancements at 1.6. Street frontages are described in 1.7 and communal gardens within the site at 1.8. A palette of hard and soft landscape materials is described in 1.9 -1.12. Section 2 describes the detailed proposals for Phase at the west end of the site.

1.11.2 addresses Biodiversity Net Gain and the Urban Greening Factor calculation which produces a score of 0.45 - above the GLA target of 0.4 (for residential areas). - Further details are required to substantiate this figure. .

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.

PLANNING OFFICER COMMENT

Officers have recommended the highlighted planning conditions where appropriate.

HIGHWAYS TEAM

A part outline and part full planning application has been received to develop 240no. residential units on a site 1.5km north of Hayes town centre. The full planning application is for 30no. of the 240no., units the outline application is for the remaining 210no. units. The development would provide 68no. on-plot parking spaces which would include 8no. blue badge wheelchair accessible spaces. Fourteen spaces of these spaces would have active electric vehicle charge points with 54.no having passive provision. The 68no. on-plot car parking spaces would be within two separate podium car parks both with an access leading of Avondale Drive. The ratio of car parking spaces to units would be 0.3.

The site is situated along Avondale Drive which leads off Coldharbour Lane c.500m to the west, it is bounded by Avondale Drive to the south, Abbotswood Way to the east, Minet Nursery, Infant and Junior School and Minet Clinic to the west, with Hitherbroom Park and the school playing field to the north. Avondale Drive primarily gives access to residential properties, but it also provides access to Minet Nursery, Infant and Junior School and Minet Clinic. Hayes town centre offers 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 Lombardy retail park is c.1.4m to the north which is the location of a large supermarket. Buses to Hayes town centre and the Lombardy retail park are available from Coldharbour Lane.

The existing estate comprises of 144no. homes in three 13 storey tower blocks, the three towers are identical, and each contain 48no. two-bedroom flats. Covered parking is provided in single storey buildings between the towers, this provides 88no. on-plot car parking spaces, the ratio of parking spaces to flats is 0.6. Access to the parking is from Avondale Drive, at its far eastern end Avondale Drive swings round in a northerly direction, here the road name changes to Abbotswood Way. The applicant reports that many residents do not feel safe parking their cars in the covered parking structures and prefer to park on either the estate access road or along Avondale Drive. There are localised double yellow lines and 08:00 to 10:00h and 14:30 to 16:30h single yellow lines in the vicinity of the school, otherwise much of the parking along Avondale Drive is unrestricted. There are no parking restrictions at all where the site fronts onto Avondale Drive. Avondale Drive benefits from two-way working, footways, and street lighting on either side of the road and a 20mph zone around the schools.

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 considering 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 1b bordering 2 indicating access to public transport is poor compared to London suggesting that many future residents would rely on the private car for trip making.

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 an Outer London Opportunity Area provide a maximum of 0.5 spaces per dwelling, Policy T6.1 would therefore allow up to 120no. car parking spaces. Whilst the 68no. on-plot car parking spaces proposed is in accordance with Policy T6.1 it is significantly less than the maximum which is appropriate for developments with poor access to public transport, shops, services and facilities. Providing car parking at the current ratio of 0.6 would provide 144no. on-plot parking spaces being provided (240 x 0.6). As only 68no. car parking spaces would be provided on-plot c.76no. vehicles could potentially be displaced on-street

(144-68=76).

To determine whether the local highway network has the capacity to cater for this displaced car parking a Lambeth Methodology parking stress surveys has been undertaken. The applicant reports that in the vicinity of the application site there is enough unrestricted kerb space to accommodate 261no. parked vehicles. The results of the survey showed that 104no. of the 261no. spaces were occupied with the remaining 57no. being vacant, this represents a parking stress value of 40%. The applicant highlights that in addition to the 261no. unrestricted spaces there is further on-street parking is available at night-time when the single yellow line or school keep clear restrictions are not operational.

The applicant contends that parking stress occurs when 85% of all spaces are occupied. The applicant reports that Avondale Drive has capacity to accommodate 261no. cars parked on-street, parking stress would therefore arise when 222no. vehicles are parked within the unrestricted kerb space ($261 \times 85\% = 222$). Parking stress surveys carried out to support this application showed that there were already 104no. cars parked on-street. There is, therefore, a reserve capacity to accommodate c.118no. additional vehicles before this 85% parking stress threshold is reached ($222 - 104 = 118$). As mentioned above, based on existing provision (ratio 0.6) 76no. vehicles would be displaced on-street, when this occurs there would still be 42no. vacant spaces for others to use ($104 + 76 = 180$) ($222 - 180 = 42$). "With" the development it is anticipated there would be a parking stress of 69% ($104 + 76 = 180$) ($100 / 261 \times 180 = 69\%$).

The Highway Authority is however concerned that without the proposal providing genuine travel choice the displacement of parking on-street may lead to problems that manifest themselves in pavement parking, obstruction of driveways and accesses, hindrance to larger delivery and refuse vehicles, damage to soft landscaping and footways, and cluttered, unsightly streets. They cause tension between neighbours that has been known to escalate into violence in some cases. This would be contrary to the published London Plan (2021) Policy T2 Health Streets which requires that development proposals should "reduce the dominance of vehicles on London's streets whether stationary or moving".

In accordance with the London Plan Policy T6.1 Residential Parking the Highway Authority requires that all communal on-plot parking spaces are leased rather than sold. If the application were to be approved this should be secured by way of a planning condition.

The development would provide 440no. cycle parking bays, there would be 1.8 bays per unit which assuming the development would comprise some studio and one-bedroom units is in accordance with the London Plan (2021) Policy T5 Cycling.

The London Plan Policy T6.1 Residential 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 Policy T6.1 Residential Parking 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 also policy compliant.

All apartment blocks will have a secured internal refuse store on the ground floor, close to the lobby entrances. The apartment blocks refuse will be collected on-street, refuse vehicle will drive around Park Street to collect refuse. The average drag distance for refuse collection is less than 10m from each refuse store across the site, the longest being 14.4m.

Services and deliveries will be broadly along the same lines as the refuse collection. The Highway Authority approve these arrangements. Avondale Drive and Abbotswood Way will be maintained as

the primary access for emergency vehicles into the development site as will Park Street.

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 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".

The application site has a PTAL ranking of just 1b bordering 2 indicating that access to public transport is limited suggesting that there would be a strong reliance on the private car for trip making. However, the proposed development provides just 68no. on-plot car parking spaces to cater for 240no. units, a ratio of 0.3 car parking spaces per unit, in contrast the site in its existing use has a ratio of 0.6 car parking spaces per dwelling. The London Plan (2022) would allow up 120no. spaces, 52no. more than that proposed (120-68=52).

Without measures to mitigate against the highway impact of the development the Highway Authority consider it likely that the development will displace c.76no. vehicles on-street. The development would lead to parking stress and injudicious parking which would present a risk to road safety and hinder the free-flow of traffic. The site is in very close proximity to Minet Nursery, Infant and Junior School heightens these road safety concerns as young children walking amongst the most vulnerable of all road users' groups. By virtue of the lack of parking, the development would be counter to the London Plan (2021) policies Policy T2 Health Streets which requires that development proposals should "reduce the dominance of vehicles on London's streets whether stationary or moving", Policy T4 Assessing and mitigating transport impacts which requires that "development proposals do not increase road danger".

Taking into account the number of car parking spaces proposed, the likely level of car ownership among future residents and that there are currently no parking restrictions along Avondale Drive it is anticipated that c.76no. cars owned by future residents would be displaced on-street. This would result in Avondale Drive being characterised by rows of parked cars which would be contrary to London Plan Policy T2 Healthy Streets which states that development proposals should "reduce the dominance of vehicle on London's streets whether stationary or moving". Parking stress increases the road safety risk to vulnerable road users, it necessitates people having to cross the road in between parked cars, parked cars obscure drivers and pedestrians sight lines increasing the risk of collision and personal injury. A development that creates parking stress is contrary to Policy T4 Assessing and mitigating transport impacts which states "development proposals should not increase road danger".

The above scenario would not arise if there were parking restrictions in place along Avondale Drive, as person reliant on a private car for trip making would decide that the proposed development is not suitable for their needs and would choose instead to live in a development where parking is provided.

The outcome would be a development occupied by residents that do not own a car and therefore have no need for parking whether on-plot or on-street.

However, the London Plan Policy T6 Car Parking states that "an absence of local on-street parking should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets". The Highway Authority is aware that a petition has been received from local residents asking for a Parking Management Scheme to be created. Arrangements are in place for this petition to be heard by the Cabinet Member for Public Safety and Transport, depending on the outcome of this hearing this may lead to informal consultation and if supported formal consultation. If no objections are raised during formal consultation or any that are dismissed by the Cabinet Member for Public Safety and Transport the Parking Management Scheme would come into force. This scenario would help make the development acceptable in highway terms as the occupiers of the new development could be prohibited from applying for permits to join this scheme.

To address the issues discussed above the Highway Authority request that any forthcoming planning approval is subject to the following planning conditions. The Highway Authority priority is that the applicant enters a 1990 Town and County Planning Act s.106 legal agreement that obliges the applicant to fund the package of works identified as part of the Active Travel Zone assessment. With these measures in place the occupiers of the development would have genuine alternative opportunities for trip making other than resorting to the private car. These contributions together with a s.106 legal agreement that prohibits the occupiers from joining any future parking management scheme would overcome the Highway Authorities concerns that the development would lead to parking stress and increase the risk to road safety, the development would then be in accordance with the London Plan Policies T2. and T4.

To make the development acceptable in highway terms the Highway Authority requests a planning condition requiring the applicant to enter into a s.106 legal agreement with the Council which obliges the applicant to pay the Council £50,000 for the implementation of parking restrictions should the development displace parking on-street as is anticipated. If after 3 years, it is shown that the development has not led to Avondale Drive being dominated by vehicles then the money would be returned to the applicant. Furthermore, if the existing residents of Avondale Drive request and support the introduction of a parking management scheme then the Highway Authority requires that the residents of the development are prohibited from applying to join such scheme. These requirements should be secured by way of a suitably worded planning condition. The Highway Authority also requires a contribution towards the supply and installation of 2no. Santander docking stations each with 10no. bicycles. One would be located at the proposal site the other at the Lombardy retail park. Residents would then have the choice of cycling to the supermarket to buy groceries - reducing reliance on the private car.

Should the application be recommended for approval, the Highway Authority required the following planning conditions and Heads of Terms.

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 440no. 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 5no. 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 lease car parking spaces as opposed to selling them.
- 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 Travel Plan for approval.
- 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 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.

Heads of Terms

The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act with the Council that obliges the applicant to enter fund those measure identified by the Active Travel Zone assessment at a cost of £120,000.

The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act with the Council which obliges the applicant to pay the Council £50,000 for the implementation of parking restrictions should the development displace parking on-street as is anticipated.

As surety that the Travel Plan is delivered the Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act with the Council that obliges the developer to provide a £20,000 Travel Plan bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. If the Travel Plan is successful, the bond will be returned.

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.

With all the above listed conditions and heads of terms in place the forecast 68% parking stress should not arise, subject to this there are no highway objections to this development.

PLANNING OFFICER COMMENT

Officers note the issues raised by the Highways Authority in relation to all highway matters and suitably worded planning conditions are recommended to be attached to the permission together with obligations contained within the Section 106 legal agreement.

PLANNING POLICY

Principle of Development

The site is already in residential use and therefore the principle of optimising the site for further residential development is supported, subject to details outlined below.

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 floorspace. The proposed development will provide 240 new homes, which generates a density of 224 dwellings per hectare and therefore conforms with this part of Policy H8. The applicant has also demonstrated how alternative options have been considered and that ultimately rebuilding the homes was the optimal solution.

Policy H8 requires that the demolition of affordable housing should only be permitted where it is replaced by an equivalent amount of affordable housing floorspace. The proposal will include 52.5% affordable housing (based on floorspace), which equals 8,760 sqm and is an uplift on the 7,755 sqm in the existing buildings. The Planning Statement confirms that affordable housing will be provided as

social rent, in order to reprovide the existing affordable housing tenure and facilitate a right to return

The applicant has submitted a financial viability assessment which will be reviewed to determine whether the above is the maximum achievable uplift.

As the affordable housing is proposed to be in separate blocks, rather than pepper-potted through the site, the case officer should also confirm that the affordable housing blocks are designed to the same standard or better and should share the same level of amenity, in line with Policy DMH 7 of the Local Plan: Part 2 (2020).

Housing Size Mix

The submission outlines that all 144 of the existing flats are two-bedroom units. This approach is inconsistent with current good urban design principles, which encourage a range of unit sizes in new developments, to ensure a mixed community.

The proposed housing size mix is as follows:

85 x 1 bedroom (35.4%)

115 x 2 Bedroom (47.9%)

35 x 3 Bedroom (14.6%)

5 x 4 Bedroom (2.1%)

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

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

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

The proposal is contrary to Policy DMH 2 in so far as it does not reflect the Council's latest borough-wide information on housing need, which is detail in Paragraph 4.6. In terms of the site-specific factors outlined in Policy H10 that may allow for a contradiction with this need, the site is not located within a town centre or near to a station (1.6km from Hayes & Harlington). It has a poor public transport access and connectivity (PTAL 1B using WebCAT or PTAL 2 utilising manual calculation in transport assessment). In terms of the mix of uses, the proposal is entirely residential and therefore there are no limits in place from any requirement to include non-residential uses as lower levels. In terms of the range of tenures on site, there are no intermediate housing products that would be typically suggest a requirement for smaller units. The scheme includes a high proportion (117 units or 52.5% of the floorspace) of Social Rented homes, which typically would be encouraged on larger schemes.

The proposal therefore conflicts with Policy DMH 2 of the Local Plan: Part 2 (2020) and Policy H10 of the London Plan (2021). The applicant has provided additional justification for the conflict with these policies, which is outlined below. This justification qualifies as a material planning consideration that warrants a departure from these two Development Plan policies in this instance.

As the proposal is an estate regeneration scheme, it must incorporate social rent replacement units, in order for existing residents to be able to return to the scheme under the right to return.

The proposed housing size mix for the social rent replacement housing is as follows:

29 x 1 Bedroom (24.8%)
55 x 2 Bedroom (47.0%)
28 x 3 Bedroom (23.9%)
5 x 4 Bedroom (4.3%)

Prior to submission, desk top analysis of the likely housing need of residents across the whole site was undertaken by the housing team and detailed housing needs interviews with those in phase one. At the time the design was finalised, there were 108 households with a right to return. This is less than the existing 121 social rented unit number due to some properties being let on a temporary basis and a few households that had already confirmed that they did not want to use their right to return.

Of these, 93 households were a one or two bed need. This was not unexpected as the existing property is 100% two-bed. This figure is 79.5% of the 117 rented homes being re-provided on site. Rather than design a 79.5% one and two bed scheme, using conservative estimates of the likely future voluntary off site moves/waivers based on experience elsewhere, the housing team calculated that a 72% one and two bed scheme would mean that there was some allowance for some households to grow over the life of the project and would also mean that excess homes would be three/four bed and most useful to the housing register.

The proposed housing size mix for the private housing is as follows:

56 x 1 Bedroom (45.5%)
60 x 2 Bedroom (48.8%)
7 x 3 Bedroom (5.7%)

As an estate regeneration scheme, the private housing units are required to enable development and reduce the viability gap. As outlined elsewhere in this report, a substantial viability gap has been demonstrated through the submission and review of a financial viability assessment. This assessment also outlines that the value per sqm to be accumulated for larger family sized units is less than for smaller sized units, which has been accepted in the review. A higher proportion of family sized private units would therefore increase the viability gap that already exists, making the scheme less viable.

Public Open Space

Policy DMCI 4 of the Local Plan: Part 2 (2020) outlines that new major developments must provide new public open space or enhancements to existing open spaces. Developments that fail to make such provision will be resisted.

The existing estate has been designed next to the Hitherbroom Park, which forms part of the same public landownership. It is therefore not anticipated that brand new public open space will be necessary, however there will be an expectation that the scheme enhances the existing open space.

A connection has been included which would provide better pedestrian and bicycle access to the park, however the benefits of this are reduced by the fact that this will be a shared surface and have car parking down one side.

Children's Play Space

The proposal involves the loss of the Avondale Children's Playground, which can be used by existing residents and the wider public. During earlier designs, it was indicated that there would be a critical mass of playspace delivered on the ground floor along Avondale Drive, which would have kept it available to the public. It would appear that the new proposal does not include a critical mass of children's play space for the public and residents. It is indicated that Hitherbroom Park will now be used to make up the necessary provision, however this is deemed to be a sub-optimal solution as this is already a very small park and the encroachment of a playground will limit the amount of space for existing park users.

PLANNING OFFICER COMMENT

Officers have negotiated with the applicant a suite of mitigation measures in relation to Public Open Space and the provision of play provision and these are discussed in Section 7.11 of this report.

LAND CONTAMINATION TEAM

I have reviewed the following report document, with particular focus on the geo-environmental information provided.:

Title Avondale Drive Estate Geotechnical and Geo-environmental Desk Study Report; Ref: 1990-A2S-XX-XX-RP-Y-0002-00; Date: 30th November 2021; Prepared by: A-squared Studio Engineers Ltd.

The report provides a comprehensive account of the site and its surroundings. An initial conceptual site model (CSM) and preliminary risk assessment (PRA) are also included. Notwithstanding the satisfactory conclusions and recommendations made within the report, I recommend the following condition to be imposed if outline planning permission is granted:

Proposed condition for land affected by contamination.

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

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

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

(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 have been carried out in full and in accordance with the approved methodology.

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

REASON

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

PLANNING OFFICER COMMENT

Officers have recommended that the planning conditions highlighted above are attached to sufficient to address land contamination issues.

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 requirement 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, 26/11/21). 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.

PLANNING OFFICER COMMENT

Officers have recommended that the planning conditions highlighted above are attached to be sufficient to address the sustainability issues raised.

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.

PLANNING OFFICER COMMENT

Officers have recommended that the planning conditions highlighted above are attached to sufficient to address ecology issues raised.

FLOOD AND DRAINAGE TEAM

The applicants have submitted a drainage strategy by Whitby Woods dated 29/11/21.

The proposals are to restrict to 4.3l/s (QBAR) represents a betterment of 99% against the 100year brownfield rate and a 96% betterment against the 1 year brownfield rate. Green roofs at high level and rain gardens, with permeable paving systems at ground level will ensure water treatment is provided and SuDS are incorporated into the landscaping strategy.

Appendix E which shows the proposed drainage show no living roofs and that the site is largely attenuated within below ground geo-cellular tanks. The plans for the drainage appear to discharge to a foul sewer according to the WW plans but the Thames Water mapping would imply that this is the surface water sewer but that the sewer ends at the Parkway. We require that TW confirm that this SW drainage catchment can receive this discharge or the proposals should drain to the adjacent surface water sewer on Abbotswood Way.

Two outfalls are proposed to allow for the phased construction and two sewers which have been identified as potential diversion or build-over agreements. At the time of drafting this report, an agreement is still required with Thames Water and this will be sought post planning via a S185

agreement. If changes are required these proposed plans may need to be changed. As all matters are reserved then an appropriate condition should be applied to secure the detail of the drainage plans as design evolves.

PLANNING OFFICER COMMENT

Officers note that Thames Water raises no objection subject to suitably worded planning conditions and Officers have recommended that the planning conditions highlighted above are attached to sufficient to address flood and drainage issues raised.

Updated comments - 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.

AIR QUALITY

The proposed development is located within the LBH Air Quality Management area (AQMA), and within LBH Hays Focus Area catchment area, bringing additional traffic emissions which will add to current poor air quality in the area. Based on the information provided in the Transport Assessment report to support the planning application, the proposal is air not quality neutral for transport emissions and not air quality positive. 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 for the track-out routes of the construction lorries. 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 Neutral 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.

OUTLINE APPLICATION: The level of mitigation required to the proposed development for traffic emissions for the outline application is £96,878. Once all deductions are applied, the remaining value of mitigation due is £58,127. Flat rate deductions applied are as follow: Green Sustainable Measures (5%), Travel Plan (15%), contribution to long term LBH strategic long-term strategies (multi modal shift strategies, 20%), totalling a reduction of £38,751.

Therefore, for the Outline application, a declaration that either a) a section 106 agreement with the LAP of £58,127 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 at the detailed stage; or b) endeavours will be made at the detailed stage to make the proposal air quality neutral for air quality. The Section 106 value due will be determined and secured at the detailed stage.

DETAILED APPLICATION: The level of mitigation required to the proposed development for traffic emissions for the detailed application is £6,193. Once all deductions were applied, the remaining value of mitigation due is £3,716. Flat rate deductions applied are as follow: Green Sustainable Measures (5%), Travel Plan (15%), contribution to long term LBH strategic long-term strategies (social support, modal shift, 20%), totalling a reduction of £2,477.

Therefore, For the DETAILED application, a section 106 agreement with the LAP of £3,716 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.

PLANNING OFFICER COMMENT

The detailed phase financial contributions in line with the above recommendations is to be attached to the Section 106 Agreement. In relation to the outline element of the scheme, a phase by phase Air Quality Assessment is proposed to be requested by condition to assess the damage cost for each relevant phase. It is anticipated that the sum could go up or down and therefore it is pertinent to ensure an up to date assessment captures any change

SUNLIGHT DAYLIGHT AND OVERSHADOWING CONSULTANT (Summary)

Neighbours Impact Conclusion

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 mitigating factors with only 29-33 Avondale Drive and 1-24 Gade Close requiring further consideration.

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. That is save for the requirement for transient shadow analysis to be undertaken on the School play area.

PLANNING OFFICER COMMENT

Officers note that 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.

NOISE (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 recommended accordingly and is further discussed in Section 7.18 of this report.

DESIGN COMMENTS

The site and surrounds

The existing estate comprises of 144 homes in three 13 storey tower blocks. The towers are identical with each containing 48 two-bedroom flats. The ground floor accommodates storage, plant, communal entrances. The towers have no designated front and back and sit within undefined external space consisting of tarmac, paving and planted beds. The blocks at ground level have no windows presenting dead inactive frontages to the street.

Between the tower blocks are covered single storey car parks the elevations of which are enclosed with mesh. Garages are located in the west of the site which are leased out to residents by Hillingdon Council. These elements add to the poor-quality public realm creating a harsh and unwelcoming streetscape.

The estate is bound by Avondale Drive to the south, Abbotswood Way to the east, Minet Infant School to the west, with Hitherbroom Park and the school playing field to the north of the site.

The character of the local area is defined by the surrounding green spaces, including Hitherbroom Park and Minet Country Park which is separated from the site by the A312 (The Park Way).

Housing developments of the 1980's are located opposite the site on Avondale Drive and to the north of Hitherbroom Park consisting of low-rise apartment buildings and houses. The wider area is predominantly pre/post-war two-storey semi-detached houses.

There is a significant difference between the scale of the existing tower blocks and the more suburban scale of the houses and flats in the surrounding area. The tower blocks are a different typology and urban grain to their surroundings and stand out prominently within this part of the townscape and are seen in views over large distances.

Avondale Drive has a green and leafy character defined by the trees and verges along its length. The existing estate provides plant bed and trees where the buildings are set back and is reflective of the verdant character of the local area.

Two conservation areas are located in the wider area. The Thorn EMI Conservation Area and the Nestle/Rowntree Factory Conservation Area are both located southwest of the site beyond the Grand Union Canal.

There are seven Statutory Listed Buildings within the area. Whitehall, the Church of St Mary and the Mecca Bingo Club lie to the north and west of the site. Botwell House, The Enterprise House, St Anselm Church and Benlow Works are all located to the southwest of the site towards the canal. None are in the immediate vicinity of the site or directly visible from the site.

Four Locally Listed Buildings are located within the area. These include the Bandstand in Barra Hall Park, the warehouse on Silverdale Road, the Old Crown Pub on Station Road and Hayes and Harlington Station. None are in the immediate vicinity of the site.

There are two Areas of Special Local Character (ASLC) identified nearby. Central Avenue is located to the west and West Walk is located to the south of the site.

Given the distances of the heritage assets and the intervening development and green spaces to the development site the proposals are not considered to cause harm to their setting.

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 three urban blocks. The urban blocks are designed to provide maximum frontage to streets and to define public, communal and private space. The blocks will run in an east-west alignment from Abbotswood Way to Minet Infant and Junior School parallel to Avondale Road.

The layout allows for parking podiums to be included that are hidden within the urban blocks so streets and outdoor spaces will not be cluttered by parked cars. Unsightly clutter such as bin stores, bike stores and plant rooms will also be hidden from view within the podiums wherever possible allowing the streets to be activated with front doors to streets.

Two urban blocks are located between Avondale Drive and the school playing field. These are linked by two houses which define a courtyard. A larger urban block is located on the east of the site supporting an increase in scale facing open spaces to the north (Hitherbroom Park) and east (Abbotswood Way).

The layout has been designed to establish a more traditional streetscape which responds much better to the surrounding neighbourhood than the existing tower blocks. It will create a welcome framework of streets with different scales and characters. A new connecting street, 'Park Street' would be created between the blocks connecting Avondale Drive with Hitherbroom Park. This new connection is welcomed and will benefit the residents of the estate and make the park more accessible from surrounding streets.

The proposals will create urban blocks with defined fronts and backs. The proposed communal gardens in the centre of urban blocks will provide generous outdoor space and will provide an attractive green outlook from the windows of surrounding rooms.

The illustrative masterplan is considered to be well conceived and acceptable. It represents a 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 surrounding context. The approach has been to optimise footprint in order to create a street scale architecture. The scheme provides a more readable datum height ranging between 5 and 8 storeys than the 13 storey tower blocks. This is a scale which people can associate and feel comfortable within.

The changes in height also help to create variety within the streetscape and a more interesting skyline that will help it to better integrate with surrounding context.

The building heights along Avondale Drive street frontage have been kept lower at five-storeys to allow for a gradual rise in storey heights so that the slightly lower buildings opposite, which are three storeys plus a pitched roof, are not overwhelmed. The seven-storey height is proposed where the street frontage steps back to create pockets of public green space.

A building height of 8 and 10-storey is proposed fronting onto Hitherbroom Park and the green space along Abbotswood Way. The proposed 10-storey building will create more of a landmark which helps to signpost the new connection to Hitherton Park from Avondale Drive

The gaps between the blocks will help to break-up the massing and provide views through to trees and landscaping as well as the sky.

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

Taking into consideration the existing arrangement of the 13-storey blocks the proposed height, scale and massing would be considered an improvement and acceptable for the proposed development site.

Elevational Design and Landscaping

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 a more active 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.

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 detailing of the surrounding context. The architectural language is proposed to vary within the scheme to reinforce the character and identify of the different street types. This approach is supported and would allow the new development to harmonise the other buildings in the area.

The indicative studies within the Design and Access Statement show how the development can draw on the materials and details of surrounding residential 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.

The consistent approach to the palette of materials and detailing across the scheme is welcomed and would allow for a shared commonality across the development. A red multi-stock brick is proposed as the main cladding material with the seven storey buildings on Avondale Drive having a different but complementary brick tone. The 10 and 8 storey buildings facing open spaces are envisaged to use an alternative material colour to provide variety and reflect their different character. This approach is supported.

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. The combination of railings and hedging to defensible space is supported and will provide the building with a soft landscaped setting that would also respond well to the verdant character of the local area.

Phase 1 (Full Planning)

Phase 1A which forms the full planning element of this hybrid application is shown in detail. The block is located at the western end of the site fronting onto Avondale Drive. The site is currently occupied by garages and associated parking, the western boundary borders Minet Infant and Junior School with the school grounds running along the northern boundary.

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.

The proposal will face Phase 2 which will be delivered under a future reserved matters application.

The 5-storey L-shaped block provides a total of 30 affordable rent homes in a single building. The building encloses a ground-floor level communal garden to the north whilst on-street car parking will be provided in front of the building along Avondale Drive.

In addition to the residential block, it is also proposed to construct a substation which is required as part of Phase 1A. This will be located to the south-west of the building fronting onto Avondale Drive and will also act as secure boundary to the gardens.

A shared communal garden is designed into the Phase 1A. This will provide shared outdoor space for all residents of the block and will help with passive surveillance. The courtyard will be fully enclosed by Block B that would form part of Phase 2 and the garden would eventually be accessible for residents of both blocks.

The building frontage will accommodate duplex homes onto Avondale Drive at ground and first floor level. The human-scale that would be created will also introduce activity with front doors to streets and windows to allow for passive surveillance. The duplex homes will be clearly defined at the base of the building with architectural detailing and materiality that will help to clearly define the units whilst adding visual interest to the street.

The principal entrance incorporates architectural detailing and signage. This will help to give it a presence on the street and create a sense of arrival and legibility to the block. The large-glazed entrance hall will create a light filled space and provide direct access and views through to the communal garden.

The appearance of Block1 has been carefully considered to respond to the local context. The appearance adheres to the architectural strategies for the appearance of the building within Chapter 4 of the Design and Access Statement. This will ensure that there is a coherent approach across the site and reinforce a sense of place.

The primary material palette for Block1 is brickwork. This has a strong connection with the domestic architecture in the area and will incorporate visual interest in the form of brick detailing and contrasting brick colours. The material will also weather well and mellow with the passage of time.

The brickwork will provide detailing around the window and door reveals as well as to the corners of the building and the roof parapet and would provide visual interest to the building and wider streetscape. The bricks and mortar colour will need to be carefully chosen and secured by condition. A sample panel of brickwork would also be necessary so that the brick detailing can be agreed along with the quality of the workmanship. (There are some concerns with the used of a white mortar that might stand out more prominently and draw undue attention)

In addition to brickwork the elevation will be further modelled with balconies and balustrades. These are proposed to be in a claret colour to complement the tone of the brick. Bin, bike and plant room doors will be laser cut metal will also be in a colour to match the balconies. In contrast the windows will be finished in a warm grey colour to complement the red and dark claret brickwork. This approach is considered acceptable, however, samples will need to be agreed under condition to ensure all materials are complementary to one another.

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

ACCESSIBILITY COMMENTS

Outline planning permission (with all matters reserved) is sought for the erection of new buildings, amenity space, open space, and cycle parking spaces to support Phase 1 for 30 residential units within Block A of between two and ten storeys.

The proposal seeks to regenerate the existing housing estate and surrounding area in collaboration with Hillingdon Housing to provide 117 replacement Affordable Rent homes. The Design & Access Statement states that 10% of homes would be designed for wheelchair users in accordance with Approved Document M, however, only limited information has been submitted on accessibility and how inclusive design has been considered.

A development of this size and scale is subject to compliance with London Plan policy D1, D5, D7, D12, S4 and T6.1:

Limited details have been provided due to the hybrid nature of this proposal, and any approval should ensure accessibility requirements are secured by way of suitable planning conditions as drafted below:

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.

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

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 are proposed in front of the Phase 1(A) building along Avondale Drive. An additional parking bay should be allocated.

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. All units should meet the minimum standard of M4 (2) as required by London Plan policy D7, with 10% constructed to a wheelchair accessible standard. A floor plan at no less than 1:100 should be submitted for each of the different M4(3) units. All details, to include transfer zones, wheelchair storage area, and other spatial requirements within bedrooms, bathrooms, living and dining areas, should be shown on a separate plan for every different unit type.

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.

The Phase 1(A) development hereby approved shall ensure that three 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. A minimum of two lifts should be provided within the proposed new buildings, one of which should be an evacuation lift in compliance with BS EN 81-76, BS 9999 and BS 9991.

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.

5. 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.

PLANNING OFFICER COMMENT

Conditions are imposed regarding dial a ride, sensory play, M4 (2) category 2 and category 3 units. 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.

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.

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.

LAs 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 delivery 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, albeit a reduced number of homes (117), due to the fact that a higher number of larger homes (3 and 4 bedrooms) are being proposed than existing. In addition the quality of the accommodation proposed would also be enhanced, however, this, along with the overall affordable housing provision, is discussed in subsequent sections of this report. This equates to a total affordable housing provision of 52.5% by floor area (54.6% by habitable room and 48.8% by dwellings) of the entire scheme.

In summary, there is an overall increase in the affordable homes floorspace provision as part of the overall proposals and hence compliance with Part A of the Policy is achieved.

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.'

Officers are aware that options other than wholesale redevelopment were investigated by the applicant and for various reasons they were ruled out as unviable. In particular and 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 Officers consider the proposal is in compliance with Part C of the Policy.

In addition to satisfying Policy H8, any application will need to demonstrate how the proposals have taken into account the requirements of the Mayor's Good Practice Guide to Estate Regeneration (2018).

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 (discussed below);
- 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. 94% of residents voted yes for full redevelopment of the existing estate from a high turnout rate of 85%. 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 all the relevant requirements of Policy H8 as the proposals have demonstrated how the wishes of residents and other stakeholders have been taken into account.

Part D of Policy H8 states 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. 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 1,005 sq m which albeit a slight reduction in the number of new homes. Nevertheless, 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 permeability and connectivity, enhanced open space and play facilities and therefore in compliance with Policy H1 of the Local Plan and Policies SD1, SD10, H8 and GG4 of the London Plan.

As such, the principle of a residential-led regeneration of the Avondale Drive Estate is supported.

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 30 new homes and the outline area for a further 210 homes.

Across the site as a whole a total of 240 new homes would replace the existing 144 units on the estate, resulting in an uplift of 96 units. In density terms, this results in 214 units per hectare however it is also important to acknowledge the the site as existing has a density of 138 units per hectare. Table 5.2 states that for locations such as this, which is identified as an 'other non town centre area', an appropriate density range of between 35 - 100 u/ha is appropriate. Clearly the application proposal is more than double this density range however one of the driving principles of Policy H8 as highlighted above is to achieve a higher density of development.

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. Notwithstanding the low PTAL of the site, there are bus connections in close proximity to the site providing good links to Hayes Town Centre and Hayes and Harlington Railway Station.

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 - 7 homes (23%)
2 bed - 16 homes (53%)
3 bed - 5 homes (17%)
4 bed - 2 homes (7%)

Total - 30 homes

In addition the Outline element of the proposals for a further 210 homes is predicted to provide the following mix for the scheme in its entirety:

1 bedroom homes - 37%
2 bedroom homes - 47%
3 & 4 bedroom homes - 16%

The proposal therefore conflicts with Policy DMH 2 of the Local Plan: Part 2 (2020) and Policy H10 of the London Plan (2021). The applicant has provided additional justification for the conflict with these policies, which is outlined below. This justification qualifies as a material planning consideration that warrants a departure from these two Development Plan policies in this instance.

As the proposal is an estate regeneration scheme, it must incorporate social rent replacement units, in order for existing residents to be able to return to the scheme under the right to return.

The proposed housing size mix for the social rent replacement housing is as follows:

29 x 1 Bedroom (24.8%)
55 x 2 Bedroom (47.0%)
28 x 3 Bedroom (23.9%)
5 x 4 Bedroom (4.3%)

Prior to submission, desk top analysis of the likely housing need of residents across the whole site was undertaken by the housing team and detailed housing needs interviews with those in phase one. At the time the design was finalised, there were 108 households with a right to return. This is less than the existing 121 social rented unit number due to some properties being let on a temporary basis and a few households that had already confirmed that they did not want to use their right to return.

Of these, 93 households were a one or two bed need. This was not unexpected as the existing property is 100% two-bed. This figure is 79.5% of the 117 rented homes being re-provided on site. Rather than design a 79.5% one and two bed scheme, using conservative estimates of the likely future voluntary off site moves/waivers based on experience elsewhere, the housing team calculated that a 72% one and two bed scheme would mean that there was some allowance for some households to grow over the life of the project and would also mean that excess homes would be three/four bed and most useful to the housing register.

The proposed housing size mix for the private housing is as follows:

56 x 1 Bedroom (45.5%)

60 x 2 Bedroom (48.8%)

7 x 3 Bedroom (5.7%)

As an estate regeneration scheme, the private housing units are required to enable development and reduce the viability gap. As outlined elsewhere in this report, a substantial viability gap has been demonstrated through the submission and review of a financial viability assessment. This assessment also outlines that the value per sqm to be accumulated for larger family sized units is less than for smaller sized units, which has been accepted in the review. A higher proportion of family sized private units would therefore increase the viability gap that already exists, making the scheme less viable.

In summary, the proposal therefore partly conflicts with Policy DMH 2 of the Local Plan: Part 2 (2020) and Policy H10 of the London Plan (2021). Nonetheless the applicant has provided details to justify for the proposed housing mix as material consideration. Given the unique requirements of this regeneration scheme in terms of the right of existing residents to return, which is then skewed towards smaller units because the current provision in the existing blocks is only for two bed units, officers are satisfied that this divergence from policy is justified in this case.

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 site is not within a Conservation Area and there are no statutory listed or locally listed building in the immediate vicinity.

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. Whilst the Ministry of Defence have not provided a response to date, if recommended for approval, planning conditions would secure a robust bird hazard management plan.

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

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

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
 - architectural composition and quality of detailing;
 - local topography, views both from and to the site; and
 - impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

D) Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

Both the outline and detailed element of the scheme is discussed in further detail under the heading of urban design, access and security.

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

OUTLINE MASTERPLAN

Turning firstly to the Outline Masterplan, the site layout has been designed to re-establish a traditional streetscape, which will integrate the site into the surrounding neighbourhood. It has been designed to enable a clear framework of streets with different scales and characters. Public realm, play facilities and landscaping is integrated into layout to provide a pedestrian friendly environment.

The site layout is defined by three urban blocks. The urban blocks are designed to provide maximum frontage to streets and will clearly define public, communal and private space. Two urban blocks are located between Avondale Drive and School playing field. These urban blocks are linked by two houses which define a courtyard.

A larger urban block is located on the east of the site supporting an increase in scale facing open spaces to the north (Hitherbroom Park) and east (Abbotswood Way).

In addition there are several supporting key urban design moves which will achieve this aim as follows:

Introduction of a new street connecting Avondale Drive and Hitherbroom Park. The existing paladin fence will be removed to allow access for pedestrians and bicycles. The new connection will benefit not only the residents of the estate but make the park more accessible from surrounding streets.

A new shared surface street will be created along the edge of Hitherbroom Park. New residential buildings facing onto this street will provide activity along the park. The new homes will benefit from views of green space and also make the park feel safer and more secure by providing passive surveillance and overlooking.

It is proposed to transform Avondale Drive with a defined building frontage. The street's green and leafy character will be retained and enhanced with building set back in key locations creating deeper pockets of green space. These pockets of green space will be located within the public realm and will provide a setting for retained and new trees.

The proposals will create urban blocks with defined fronts and backs. Communal gardens in the centre of urban blocks will provide generous outdoor space for shared recreation and play. The gardens will be accessible to only the residents of surrounding buildings and their guests. The communal gardens will also provide an attractive green outlook from the windows of surrounding rooms.

Building heights within their context

In terms of building heights, those along Avondale Drive have been carefully designed to respond to the site's context. A five storey height is proposed for the street frontage, providing a similar height to buildings opposite (three storey plus a pitched roof). A seven storey height is proposed where the street frontage steps back to create pockets of public

green space. The seven storey height will create variety in the roofscape and reflect the increased scale of its setting. Gaps between buildings will break-up the massing and provide views of sky and trees beyond.

The seven storey buildings on Avondale Drive will terminate key views from adjoining streets. The proposed height will reflect their prominent location and provide a suitable terminus which reinforces the legibility of the wider neighbourhood.

A building height of 8 and 10 storey is proposed fronting onto Hitherboom Park and green space along Abbotswood Way. The increase in height is designed to reflect the scale of the surrounding open space. The increased heights will also mean more homes benefiting from the open views. The proposed 10 storey building is designed to create a legible figure which signposts the new connection to Hitherboom Park from Avondale Drive.

DETAILED PHASE 1

In terms of the detailed element which would provide 30 new homes in a single 5 storey building with a ground-floor level communal garden to the north.

The building has been carefully arranged to ensure the building footprint can be accommodated on the existing garages site. This allows for access into and around the adjacent Glenister House tower block to be maintained whilst construction takes place. As part of the outline masterplan, the building height will be lowered to five storeys to respond to the surrounding context and reduce visual impact over the neighbouring school.

The main building frontage is defined by duplex homes onto street at ground and first floor level. This will create a human-scale street environment and provide passive surveillance so that it feels safe and active. Considerate use of architectural detailing and materiality will further enable residents to identify their individual homes along the street.

A secure communal garden is proposed to the north of the Phase 1A building, which will be for the use of the building's residents and those of the adjacent future phase. Upon completion of the future phase block, the garden will see full enclosure, giving the space a sense of privacy and shelter from the street.

The building entrance sequence provides a direct view through to the courtyard from the communal spaces and a visual aspect when walking along Avondale Drive. The eastern elevation will overlook public green space on Avondale Drive, which is delivered in Phase 2. The balconies and window openings have been carefully considered to engage with the public realm, providing residents with visual aspect and activity over the landscaped space.

On-street car parking is provided in front of the building along one edge of Avondale Drive. A substation is required as part of the development phase, which is located to the south-west of the building, providing a secure boundary from Avondale Drive to the rear gardens. A dedicated loading bay is provided in front of the building to provide a dedicated space for maintenance and prevents larger vehicles blocking the existing school crossing.

The site is relatively flat and avoids the need for stepped or ramped access into the building or within the courtyard space.

Since the submission of the application proposal Officers have negotiated a number of design changes and enhancements to the scheme as follows:

Alterations to the brickwork to give the building a greater degree of articulation;
A more celebratory residential entrance by adding more prominence to its detail;
Set back of the sub station to become a more subordinate to the main elevation; and,
Relocation of balconies which were oversailing adjacent units.

Given the above considerations, the proposed development would not be considered contrary to Policy D3 of the London Plan (2021), Policy BE 1 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

TALL BUILDINGS ASSESSMENT

Definition:

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) defines tall/high buildings and structures as those that are substantially taller than their surroundings, causing a significant change to the skyline. The Council's Townscape Character Assessment confirms that Uxbridge and Hayes are the most suitable locations for high buildings in the Borough. Outside these two centres, the character of the Borough is mainly low-rise and suburban in nature.

Context:

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

In terms of the overall approach as set out within the illustrative masterplan, the scale and massing of the scheme has been designed to integrate the site back into its surrounding context. The architects approach has been to optimise footprint in order to create a street scale architecture, that the current estate fails to provide.

There is a clear rationale for the distribution of height across the scheme to reinforce place-making across the site. The scheme is designed to provide a readable datum height ranging between 5 and 8 storey. There are changes in the heights of the buildings to create variety whilst also breaking up the massing that the height is broken with a distinctly taller building at 10 storey designed to perform a specific role in terms of the townscape.

Officers have undertaken a review of the proposal and note that the proposal reduces the overall height from that of the existing towers by 3 storeys. The proposal comprises one 10 storey tower and six linear or L-shaped blocks ranging from 5 to 8 storeys, which are grouped around three small courtyards. However, a significant change to the skyline will still be experienced from both long and mid-range views means that the development must be considered to contain tall buildings under the policy definition.

Given the development comprises of tall buildings but it is not located with a preferred tall

building location, the principle of tall buildings conflicts with the location part of the policies. However both policy DMHB 10 and policy D9 of the London Plan set out series of criteria against which to assess the impact of the proposed tall buildings.

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 wind and microclimate the application is accompanied by a specific report which considers both a quantitative and qualitative wind analysis using Computational Fluid Dynamics analysis. The key findings were that there would be no negative impact on off site conditions; the proposal will eliminate the existing unsafe wind conditions caused from wind tunneling between the existing buildings and that no mitigation measures are required as there are very limited instances where wind conditions are increased and these areas are not occupied.

Based on the evidence presented and assessed through this report, the proposed tall buildings are considered to be appropriate in terms impacts, as required by policies D9 and DMHB10. These leave a partial conflict with the location element of the tall buildings policies which is considered to be of moderate significance and which will need to be weighed against other considerations in the overall planning balance.

7.08 Impact on neighbours

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

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

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

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

Paragraph 5.41 of the Hillingdon Local Plan: Part 2 (2020) states: "The Council will aim to

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

The 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 AND PRIVACY

Outline element

The nearest existing residential properties to the application site are located on the opposite side (south) of Avondale Drive and considering that the proposals is set back from the footpath edge a minimum separation distance to those dwelling is a minimum of 21 metres for the majority of the development and this is only breached once to the corner of a building where the distance is 19.5m. To the north of the site is Hitherbroom Park and there are no overlooking or privacy issues arising. To the east is Minet School and given the school buildings are set away from the boundary no unacceptable overlooking or privacy issues arise.

In terms of the overlooking distances within the development itself the building distances aim to provide spacial variety and relate to street typologies and the scale of buildings. The proposed building distances will also achieve adequate overlooking between homes.

Detailed Phase 1 element

Again the elevation fronting onto Avondale Drive is 21 metres away from the nearest residential properties opposite, set away from the school building as highlighted above and hence there are no unacceptable overlooking issues arising from this element of the proposal.

In summary both the detailed and outline elements of the proposals are considered not to conflict with Policy DMHB16 and Policy D6.

SUNLIGHT, DAYLIGHT AND OVERSHADOWING

A Daylight, Sunlight and Overshadowing Assessment has been undertaken by eb7 and submitted as part of this HPA. This gives consideration to the levels of daylight and sunlight being achieved within the Proposed Development in the interest of 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. This includes the neighbouring residential properties along the south of Avondale Drive, the apartment block at 1-24 Gade Close to the south, the Minet Infant School to the west and the residential apartment building at 1-17 Clivesdale Drive to the south west of the site.

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.

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). This view is formed by the limited effect to the vast majority of the residential properties included in the assessment, as well as the neighbouring primary school. The effects of the proposal are therefore considered to be acceptable for a developing urban context.

Therefore the properties will still achieve satisfactory levels of residential amenity and the proposed development is not considered to result in any unacceptable harm.

In summary, 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

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 30 new homes meet and in some cases exceed the minimum space requirements. In terms of outlook, all the units have good levels of outlook with 17 of the 30 homes (57%) being dual aspect with none being north facing single aspect units.

In terms of the outline element of the development proposal, the outline parameters have been designed to ensure a minimum 21 metre separation distance between the (western) outer building footprint of the Development Zone 2 of the Outline Area and the facing elevation of proposed Block A within the Detailed First Phase and the indicative scheme demonstrates that the living conditions could meet the required standards. These elements will come forward for further detailed scrutiny when reserved matters applications are brought forward.

In summary both the detailed and outline elements of the proposals are considered not to conflict with Policy DMH16 and Policy D6.

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, based on a proposal for 7 no. 1-bed units, 16 no. 2-bed units, 5 no. 3 bed units and 2 no. 4-bed units (30 homes in total), the proposed development would require 785 square metres of private amenity space.

Based on the submitted plans, the proposed development would provide 887 sqm of private amenity space in the form of gardens, communal space and first floor balconies. This element would therefore be in accordance with LPP2 Policy DHMB18 and LP Policy D6.

In terms of the outline element for a further 210 homes whilst no 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. Notwithstanding the above, a total of 1,464 square metres of communal (private) amenity space is proposed estate-wide, as shown on the Illustrative Masterplan. This comprises podium gardens and dedicated ground floor courtyards configured between blocks as part of the Development Zones.

In addition a total of 4,087 square metres of private external amenity space is proposed, as shown on the Illustrative Masterplan. This will take the form of gardens, courtyards and terraces for ground floor and podium level units. Private balconies will be provided for units on upper floors of the residential blocks.

However, Officers have calculated that the Policy compliant area of private open space required by the mix proposed to be 5,025 sq m so a shortfall of approximately 1,062 or 21%. 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.

PUBLIC OPEN SPACE

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

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

Policy DMCI 4 of the Hillingdon Local Plan: Part 2 (2020) states:

A) Proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. Regard will be had to Hillingdon's local recommended standards of provision for all relevant typologies of open space.

B) The provision of major new pieces of open space should contribute positively to Hillingdon's existing networks of green spaces. In major town centre developments, new civic space may be required as an alternative to green open space.

C) Proposals for major new residential development that fail to make provision for new or enhanced open space, or which would result in open space that is inappropriate in type, quality or location, will be resisted.

The proposed plans indicate that 1,306 sq m of publicly accessible open space is proposed, however, this comprises of largely greening within the streetscene, to include public realm to the perimeter of the blocks as well as new landscaped areas along Avondale Drive. These areas are not therefore considered 'Public Open Space' moreover these areas represent landscape buffers. The development therefore provides limited Public Open Space.

If sufficient publicly accessible open space cannot be accommodated within the site, a financial contribution is required. In the context of the proposed development, it is considered appropriate that contributions are sought for the enhancement of existing public open space given the lack of public open space on the application proposals as the majority of the space is public realm fronting the street. Based on the Planning Obligations Supplementary Planning Document (July 2014), the financial contribution required is £128,000 and the applicant has agreed to pay this sum.

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

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 on-site as a minimum, and makes clear that play space should not be segregated by tenure.

Policies DMCI 5 and DMHB 19 of the Hillingdon Local Plan: Part 2 (2020) state:

A) For all major development proposals, the Council will apply Hillingdon's child yields and the London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies that 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds.

B) In areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.

C) The Council will resist the loss of existing play spaces unless:

- i) a replacement play space of equivalent size and functionality is provided to meet the needs of the local population. Where this is not possible, development will only be permitted in exceptional circumstances where there are over-riding planning merits to the proposal; and
- ii) it can be demonstrated robustly that they are no longer required and that their loss would not lead to a shortfall in overall play provision in the local area.

Paragraph 5.79 of the Hillingdon Local Plan: Part 2 (2020) states that the Council's Open Space Strategy proposes an accessibility standard for children's playgrounds based on a 400 metre travel distance. Specifically, Hitherbroom Park is located immediately adjacent to the north of the site.

Based on the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', play space requirements is divided into 3 categories;

- age 0-4; door step play/within 100m;
- age 5-11 years; play within 400m of site;
- age 12+ years; play within 800m of site.

Based on the GLA Population Yield Calculator (v3.2), it is anticipated that the following numbers would be yielded from the proposed development:

- 70 no. children under the age of 5 years old;
- 53 no. children aged 5 to 11 years old; and
- 34 no. children aged 12 to 17 years old.

This yields a total of 157 children, requiring 1,570 square metres where only the 0-4 age group and 5-11 age group must be provided on site or within 400 metres of the site.

In terms of children's play space, as set out in the Illustrative Landscape Strategy, a total of 994 square metres of children's play space is proposed estatewide. This comprises 814 square metres of play for children aged 0-4 years and 180 square metres for children aged 5-11 years, which caters for all doorstep play which is the minimum required on site. The quantum would also cater for proportion of 5-11 year old's 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 Hitherbroom Park (within 400m) and Minet Park (within 800m) 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.

In summary, both the detailed and outline elements of the proposals are considered not to conflict with Policy EM4, Policies DMCI 4 & 5, DMHB 18 & 19, and Policies G4, D6, S4 of the London Plan.

EXISTING PUBLIC PLAYGROUND

The application site contains an existing Children's playground which is publicly accessible to all members of the public, not only those living within the Avondale Drive estate. The proposals result in the loss of this playground in order to facilitate the development. In order to ensure that the proposals do not result in the loss of a children's play ground, a contribution of £100,000 has been secured to re-provide a children's playground within Hitherbroom Park (the proposed location would be directly adjacent to the application site boundary). The proposals are supported by the Council's Green Spaces team who would deliver the play equipment. The proposals therefore would not result in the loss of a publicly accessible play ground, although it would be relocated into the wider Hitherbroom Park setting.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The Avondale Drive Estate masterplan forms an integral part of the surrounding neighbourhood, enhancing routes through the site which link to the rest of Hayes and strengthen links to Hitherbroom Park and Minet Country Park. The masterplan has been developed such that these new connection routes maintain the vehicle needs whilst creating easy access for pedestrian and cycle routes between each plot in the development.

Avondale Drive is retained as the primary route through the site, connecting east-west through the scheme, keeping the main traffic flows away from the primary pedestrian routes. A new street which will be introduced as part of Phase 1B of the development has been carefully considered to reflect the character of the area and creates permeability between Avondale Drive and Hitherbroom Park. The residential streets also operate at reduced speeds

in these shared surface areas where pedestrians and cyclist movement occurs.

The new streets primarily serve to create permeability and servicing of the scheme, such as delivery and refuse collection. The new Phase 1 street will provide one-way access to refuse and delivery, which can then turn out onto Abbotswood Way. Two-way vehicular access is provided into the courtyard off Avondale Drive and to access the undercroft parking below the podia communal gardens.

In terms of car parking there will be 68 spaces which will serve the development and these spaces are located beneath the podiums in the building in Phase 1 b and Phase 2 and along the new streets described above.

TRAFFIC & PARKING

The site is located on Avondale Drive. Based on TfL's WebCAT planning tool, the site has a PTAL rating of 1b.

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.

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 1.5 spaces per dwelling.

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

RESIDENTIAL CAR PARKING PROVISION

As stated above the masterplan illustrates a total provision of 68 on site spaces provided along the street and within the buildings which form Phase 1B and Phase 2, as there are no on-site car parking spaces in relation to Detailed Phase 1 element.

This results in an on-site car parking ratio of approximately 0.28 spaces per dwelling. The Local Plan policies set a maximum parking standard of 1.5 spaces per dwelling based on the PTAL and the site being within an Opportunity Area.

There is no on-site car parking provision in relation to the 30 homes in Phase 1, however these new homes will be able to use the existing car parking spaces already on site until the other phases of the scheme are delivered.

In terms of car parking allocation 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.

MEASURES TO ENCOURAGE SUSTAINABLE TRAVEL DOUBLE CHECK ALAN COMMENTS

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 £120,000. These measures are proposed to encourage walking and cycling for all future residents and to encourage modal shift away from the private car. The include a new zebra crossing along Avondale Way between Cotmans Close and Hitherbroom Road, footway resurfacing and remodeling, provision of litter bins, tactile paving associated tree pits and benches.

Furthermore the Council obliges the applicant to pay the Council £50,000 for the implementation of parking restrictions should the development displace parking on-street as is anticipated as highlighted above in the Highways Authority comments.

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, whilst relatively low, is considered to be acceptable.

ACCESSIBLE PARKING

Policy T6.1 of the London Plan (2021) states:

G) Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:

- 1) ensure that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset,
- 2) demonstrate as part of the Parking Design and Management Plan, how an additional 7% of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.

The London Plan Policy T6.1 Residential Parking 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 also policy compliant.

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

In terms of the overall development the development would provide a total of 440no. cycle parking bays, there would be 1.8 bays per unit which is in accordance with the London Plan (2021) Policy T5 Cycling. This amount will be conditioned to secure policy compliant on-site cycle parking on a phase by phase basis.

In relation to the detailed Phase 1 element 57 spaces will be provided within the building itself as well as 2 short stay spaces for visitors. This is policy compliant provision.

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 complaint level of 20% which would be a 14 spaces. 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

The applicant has agreed to enter into a Section 106 obligation requiring the provision of a Car Club to serve the future residents and there have been 2 spaces which have been identified for this purpose. An obligation is recommended accordingly.

TRIP GENERATION

The Transport Assessment confirms that at the busiest time during the AM Peak the proposed development would generate 67 no. two-way person trips of which 23no. would be journeys by car. This volume of car traffic is considered insignificant and is not anticipated to present a risk to road safety or be detrimental to the free flow of traffic.

SERVICING AND DELIVERY

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

CONSTRUCTION LOGISTICS PLAN

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

SUMMARY

Subject to the planning obligations and conditions noted above, the proposed development would not be considered contrary to 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 (2019).

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 some Anti Social Behaviour problems associated within the 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 7.11 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'.

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

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

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

7.13 Provision of affordable & special needs housing

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 NPPF directs that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

The existing Estate comprises 144 homes of which 116 are in Social rent 5 are Housing Association Rented with the remaining 23 being leasehold flats, which is a total of 121 affordable homes.

The applicants 'Right to Return' agreement or 'Landlords offer' ensures all 121 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 off site as some of the residents will need to be relocated off-site to enable demolition of the existing estate. The applicant is also offering resident homeowners (leaseholders 8 households in total) the opportunity to purchase a new property on the regenerated estate on a shared equity basis if required, with the other 15 home owners being non residents ie landlords.

The applicant has submitted a financial viability assessment that has been scrutinised by an independently appointed viability consultant on behalf of the Council. The applicant's FVA concludes that the proposed development results in a viability deficit.

The FVA has been comprehensively assessed by the Local Planning Authority's independent advisors BNP Paribas who conclude the scheme cannot provide any additional affordable housing units above the current offer and concluded the following:

'Taking into account the recommended amendments outlined in this report, we have concluded that the proposed development (with a total provision of 52.5% by floor area, 54.6% by habitable room and 48.8% by dwellings of the entire scheme) generates a deficit of minus £10,439,311 against the viability benchmark. It is clear that even with the GLA grant funding to assist the development appraisal the scheme is considered to be unviable and hence one must draw the conclusion that the current proposals are showing the maximum level of AH on the site and that were more affordable homes to be provided a larger deficit would result'.

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 Avondale Drive 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). In simple terms, there would need to be a net value increase or cost decrease in excess of the agreed deficit, after taking into account the change in profit requirement (% of Gross Development Value/cost), before any additional contributions towards affordable housing would become due.

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.

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 a Landscape Strategy Plan and an Illustrative Landscape Plan which highlights an overview of the approach taken. In particular the outline scheme comprises of a series of landscape spaces, including a new landscaped frontage to Avondale Drive, a new Park Street, communal (resident only) courtyard gardens and private terraces and gardens.

The submitted Landscape Strategy Plan sets out how the Avondale Drive estate will be transformed through opening up connections both physical and visual, with Hitherbroom Park; the creation of a high quality landscaped frontage to Avondale Drive and the delivery of ambitious targets for urban greening (discussed below) and ecological enhancement.

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 0.45 which exceeds the target score. If recommended for approval, the detail of this would be secured by condition.

ECOLOGY

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

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

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 sites of international importance within 5km of the site. There is however, one Local Nature Reserve (LNR) within a 2km radius, Yeading Meadows, located 1.5km north of site.

The PEA identified value for a number of notable and protected species and habitats, including bats (foraging, commuting and roosting), nesting birds, and hedgehog. Further surveys to establish the presence/likely absence of bats in the buildings were conducted as a number of buildings were identified as having low potential to support roosting bats.

The results of these surveys indicated that three common pipistrelles (*pipistrellus pipistrellus*) were seen emerging/re-entering from three features on one of the existing buildings. The survey work has therefore confirmed the presence of three bat roosts and the necessary recommended mitigation actions are detailed within this report, which includes implementation of a 'bat sensitive' lighting strategy designed to minimise disturbance to the bats using the site.

Officers consider that subject to this condition, the proposal is considered to accord with the NPPF (2021), Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

7.15 Sustainable waste management

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.

Detailed First Phase

The Phase 1A proposals include a dedicated communal bin store along the Avondale Drive frontage, located within 10m of the carriageway, which will be used by both ground floor and upper floor units. As such, on-street delivery and servicing is envisaged, with drop-kerb provision to be delivered to ensure bins can be dragged between the store and carriageway. It will therefore facilitate safe, clean and efficient delivery and servicing operations, primarily off-street and has been designed to ensure adequate space and storage for associated arrangement in line with the anticipated needs of returning and future residents.

Outline phases

In terms of the Illustrative Masterplan has been designed to incorporate on-street servicing along Avondale Drive and Abbotswood Way for general deliveries and refuse collection, with servicing for blocks A, B, C and D taking place from Avondale Drive and servicing for blocks G and H taking place from Abbotswood Way. This approach avoids the need for a formal loading bay. Refuse Collection for Blocks E, and general servicing for other blocks within Phase 1B, can however take place from the new internal service road, although at a minimum width of 3.7m, it is acknowledged that stationary vehicles would block exit movements given the one-way arrangement. Where on-street access to bin stores is required, the proposals will include drop-kerb provision to ensure level access between the store and the carriageway.

No objections have been received from the Waste and Refuse Team as highlighted above 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 AND OVERHEATING

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 (2020) requires that:

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

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

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

The Energy Strategy for the development is to utilise a centralised air source heat pump system and PV panels. Following the energy hierarchy, passive design measures, energy

efficient equipment have shown an improvement of 63.5% improvement over Part L for the development.

In terms of Phase 1 there is a zero-carbon requirement for the development, and hence with this be secured via a planning condition.

In terms of the outline element Officers are recommending a Section 106 legal obligation to secure carbon offsetting payment for any future phases were these elements of the scheme not to be net zero carbon.

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

OVERHEATING

Policy SI 4 of the London Plan (2021) states:

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

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

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

7.17 Flooding or Drainage Issues

FLOODING AND DRAINAGE

Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless

there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision of flood risk and surface water flooding mitigation will be refused.

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

7.18 Noise or Air Quality Issues

NOISE

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

Policy D14 of the London Plan (2021) states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

- 1) avoiding significant adverse noise impacts on health and quality of life
- 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
- 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

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

The application site has numerous noise sources but primarily it comprises traffic from surrounding roads and the A312 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.

Accordingly and subject to the conditions, the proposal would accord with Policies D13 and

D14 of the London Plan (2021), Policy EM8 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

AIR QUALITY

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

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) states:

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

B) Development proposals should, as a minimum:

i) be at least "air quality neutral";

ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and

iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

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

As advised by the Council's Air Quality Officer and highlighted above in the consultation section of this report, a suite of planning conditions together with a financial contribution of for the detailed application, a section 106 agreement with the LAP of £3,716 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. A financial contribution 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.

In terms of the outline element , the applicant will be required to provide an updated Air Quality assessment on a phase by phase basis and any damage costs would be secured by the Section 106 agreement and will be determined and secured at the latter stages.

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

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 117 homes (equating to 8,760 sq m with 393 hr). 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 £3,716 is to be paid in relation to the detailed element and In terms of the OUTLINE element, subject to the submission of an updated AQA, damage costs shall be paid on a phase by phase basis, as identified by the updated Assessments. The Section 106 value due will be determined and secured at the detailed stage.
- iii. Public Open Space: A financial contribution amounting to £128,000 shall be paid to the Council for the enhancement of existing public open space within the Council's administrative area.
- iv. Highways Works: Section 278 agreement to secure highway works as follows:
- v. Off-site Play Area - A financial contribution of £100,000 shall be paid to the Council for the provision of a replacement children's play area in Hitherbroom Park at a size equivalent to that on the existing estate.
- vi. Local Highways Improvements: The following shall be paid to the Council for the local

highway improvements as set out below:

- The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act with the Council that obliges the applicant to enter fund those measure identified by the Active Travel Zone assessment at a cost of £120,000.

- The Highway Authority require that the applicant enter a s.106 agreement of the 1990 Town and Country Planning Act with the Council which obliges the applicant to pay the Council £50,000 for the implementation of parking restrictions should the development displace parking on-street as is anticipated.

vii. On site car club of up to 2 spaces, free membership for 3 years and £50 credit for one person per unit;

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

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

x. Employment Strategy and Construction Training: Details shall be in accordance with the Council Planning Obligations SPD with the requirement being for an in-kind scheme (on site) to be delivered. Securing an Employment/Training Strategy Agreement is the Council's priority.

xi. A Healthy Streets final sum to be confirmed following conclusion of discussions with GLA/TfL (no current sum stipulated in Stage 1 report);

xii 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.

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

xiv. 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

CONTAMINATED LAND

Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states that:

A) Proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

B) Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented, prior to commencement of development.

C) Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.

D) In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.

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

FIRE SAFETY

Policy D12 of the London Plan (2021) states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in terms of:

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

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 HPA to address the future requirements in relation to the Detailed and Outline Areas. 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 applicant has also submitted an Outline Fire Strategy report which demonstrates compliance with the Building Regulations. In particular the designs of the residential cores, such as travel distances etc., based on the illustrative masterplan 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. 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. Block C and F which are under 18m will incorporate a dry riser in the escape stair.

The Health and Safety Executive have been consulted on this application and have confirmed that the information submitted is satisfactory. It is noted that the outcome of the Computational Fluid Dynamics analysis may not support the inclusion of a mechanical smoke ventilation system, in which case the accommodation units in cores A, B and C will need to be redesigned.

The London Fire Brigade have also been reconsulted with further information relating to the fire strategy and have now confirmed that they have no further comment. The Health and Safety Executive have also confirmed that they are satisfied with the Fire Statement submitted.

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

HEALTH

Paragraph 92 of the NPPF (2021) states that planning decisions should aim to achieve healthy, inclusive and safe places which:

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.

Paragraph 93 of the NPPF (2021) states that planning decisions should:

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

Policy GG3 of the London Plan (2021) states that in order to improve Londoners' health and reduce health inequalities, those involved in planning and development must:

a) ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities

b) assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities

c) plan for appropriate health and care infrastructure to address the needs of London's changing and growing population

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

Paragraph 7.2 of the Hillingdon Local Plan: Part 2 (2020) also states that there is a particularly pressing need in the Borough for additional health care facilities to address higher than expected birth rates and an increase in the older population.

The floorspace occupied by affordable housing is not liable to Community Infrastructure Levy. Accordingly, the HUDU Planning Contributions Model has been used to assess the health service requirements and cost impacts of the development. In this instance a financial contribution is not required as part of the Section 106 legal agreement as there is no uplift in the number of affordable units in that all the homes are intended for returning residents.

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. In respect of the impact upon infrastructure, the proposal will generate Hillingdon and Mayoral CIL contributions to fund the provision of infrastructure. A comprehensive set of planning obligations are also to be secured by a Section 106 legal agreement if recommended for approval. Accordingly, the proposal is considered to comply with policy D2 of the London Plan (2021).

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

- 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. This is particularly true at Avondale Estate where currently all homes are two bed flats.
- 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.

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 Avondale Drive estate to provide up to 240 new homes (an uplift of 96 homes) is considered acceptable in principle. These proposals would realise 54.5% affordable housing (by habitable room) across the whole masterplan

delivering an uplift of 1,005 sq.m. of social rented floorspace.

It is agreed that the affordable housing offer is the maximum viable affordable housing provision possible with the tenure that best meets the needs of the Borough which is a notable benefit of the scheme and fully complies with Policy H8 of the London Plan.

Taking into consideration the size, scale and arrangement of the existing 13-storey blocks, it is considered that the proposed buildings scale, location and massing would be a considerable improvement to the character and appearance of the streetscene. In summary, the proposals are considered to be compliant with planning policies that relate to design and tall buildings.

The parking provision proposed is considered to be acceptable and the agreed local highway improvement works would complement the intensified use of the site and would be a benefit of the scheme. The proposed development is also considered acceptable with regard to its impact on neighbour amenity, access, security, landscaping, ecology, refuse, energy, flooding, noise and contaminated land.

The proposed development would have a slight deficit as regards the provision of public open space and playspace but this is addressed through a financial contribution towards off site open space enhancements. Unit mix is affected by right to return and scheme viability, so is marginally below the percentage of family units achieved on some other major development sites, but this is considered to be outweighed by the many other benefits of the proposals. In particular the principle of estate regeneration to deliver uplifts in affordable housing floorspace is strongly supported.

The scheme proposed would provide a net gain of 96 housing units to the existing estate and provide 54.5% affordable housing by habitable room. Full redevelopment of the site also provides an opportunity for significant improvements to the quality of stock for a longer period of time, covering matters such as energy and sustainability performance of dwellings, as well as improved standards of living.

A number of planning obligations would be secured by Section 106 legal agreement and would contribute to the mitigation of any impacts that may arise from the proposed use. This includes a travel plan, a contribution towards a Parking Management Scheme Review, parking permit restriction and Active Travel Zone improvements. Subject to securing these measures, the proposal is considered acceptable with regard to its impact on the local highway network.

Overall, the scheme delivers significant benefits, particularly the delivery of high-quality, affordable homes 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.

11. Reference Documents

National Planning Policy Framework (July 2021)

The London Plan (March 2021)

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

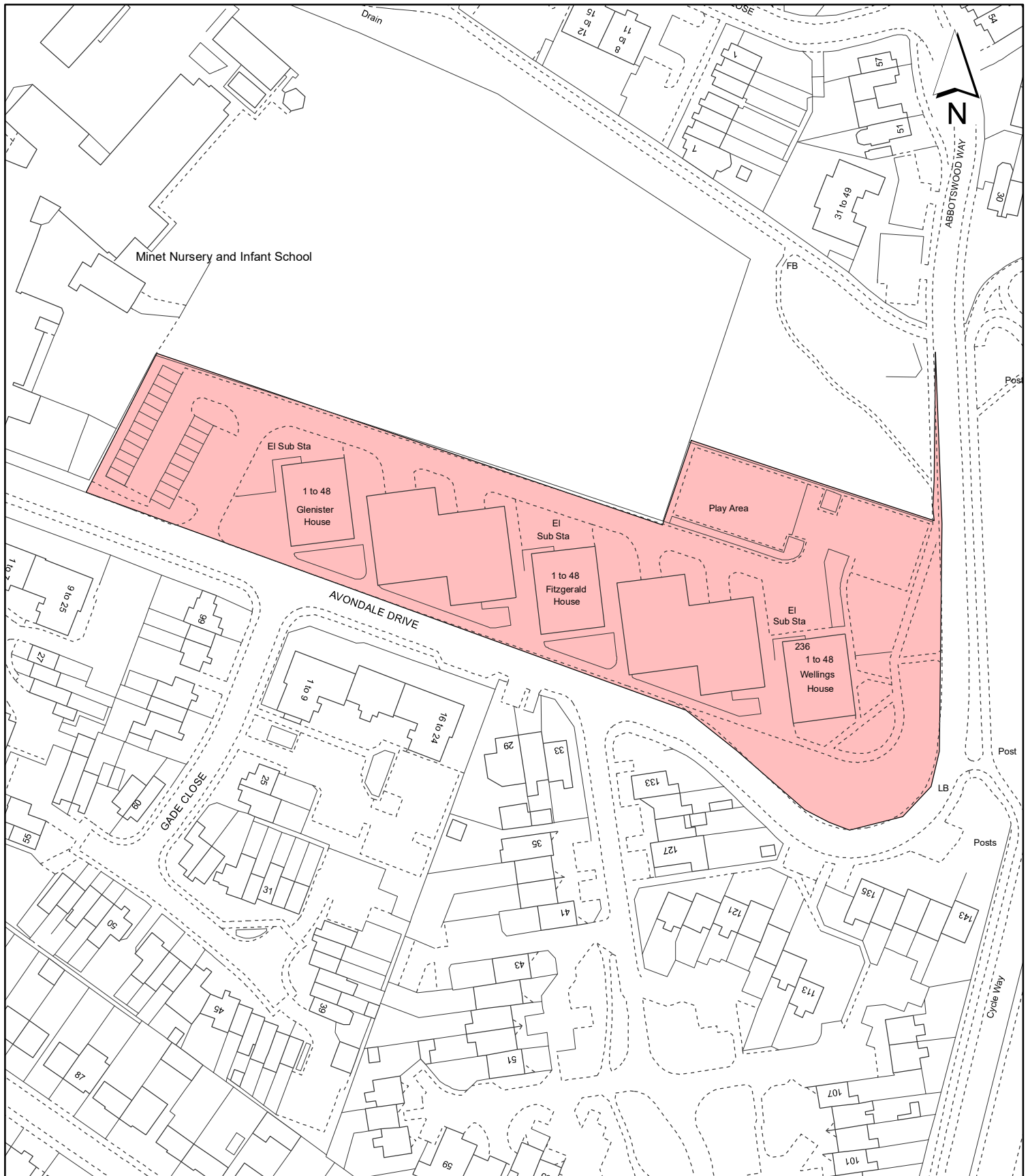
Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020)

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

Telephone No: 01895 250230



Notes:

 Site boundary

For identification purposes only.
 This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act).
 Unless the Act provides a relevant exception to copyright.
 © Crown copyright and database rights 2020 Ordnance Survey 100019283

Site Address:

Land at Avondale Drive

Planning Application Ref:
76551/APP/2021/4502

Planning Committee:
Major

Scale:
1:1,250

Date:
March 2022

LONDON BOROUGH OF HILLINGDON
Residents Services
Planning Section

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



HILLINGDON
 LONDON