



FORMER NESTLE FACTORY, HAYES

PLANNING STATEMENT

MAY 2017

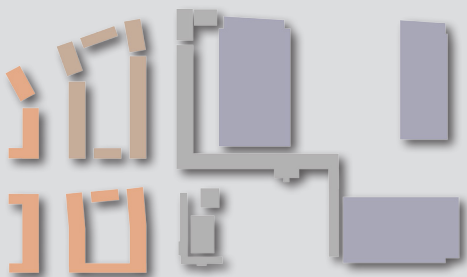
BARRATT
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SEGRO

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Planning · Design · Delivery

This planning statement has been prepared on behalf of Barratt London and SEGRO. The purpose of the statement is to assess the planning issues raised by the development proposals on the application site. It also identifies and describes the key opportunities presented by the proposed development and assesses the proposals against relevant planning policies and its conformity with the Development Plan.



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Former Nestlé Factory Hayes

Planning Statement

Prepared by Barton Willmore LLP
on behalf of SEGRO PLC and BDW Trading Limited

May 2017

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1.0 Introduction

1.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of SEGRO PLC and BDW Trading Limited (Barratt London) (“the applicants”) to be submitted in support of an application seeking full planning permission and conservation area consent for demolition for the following:

"Part-demolition of existing factory buildings and associated structures, and redevelopment to provide 1,381 dwellings (Use Class C3), office, retail, community and leisure uses (Use Classes A1/A3/A4/B1/B8/D1/D2), 22,663 sq m (GEA) of commercial floorspace (Use Classes B1c/B2/B8 and Data Centre (sui generis)), amenity and playspace, landscaping, allotments, access, service yards, associated car parking and other engineering works".

1.2 The planning application proposals are submitted after extensive pre-application discussions with the London Borough of Hillingdon (LBH), the Greater London Authority (GLA), Transport for London (TfL), Historic England (HE), through engagement with the local community and key stakeholders.

1.3 The proposed development would deliver a number of public benefits, namely:

- The redevelopment of a redundant, brownfield industrial site in a strategic location, that seeks to positively contribute to the wider area and meet the principles of strategic London Plan, local planning policy and Housing Zone aspirations by successfully co-locating housing and industrial/commercial uses on the site;
- The delivery of 1,381 new homes (a significant contribution to Hillingdon’s housing requirements in its own right and a very significant proportion of the new homes that LBH is seeking to deliver as part of the Hayes Town Centre Housing Zone, within which the site is located). A mix of unit sizes are proposed including family dwellings;
- The delivery of a policy compliant level of affordable housing at 35% by habitable room;
- The provision of a significant amount of industrial floorspace, designed to a high specification, which could provide up to 536 full-time equivalent new jobs for local people;
- The industrial units will be built to a high specification and will achieve BREEAM Very Good;

- The provision of supporting uses to create an inclusive and vibrant community, to include a children’s day nursery/community facility, a gym, café and small-scale office suites;
- A significant amount of publicly accessible open space (over 3 hectares), opening up the previously private factory gardens to the public for the first time, including new access to the Grand Union Canal (and improvements thereto) as well as providing children’s playspace, semi-private courtyards and private amenity areas;
- The retention of locally listed historic façades of the former factory building, the locally listed canteen building and entrance gates & railings, within a development of very high quality designed new buildings, which together will preserve and enhance the character and appearance of the Botwell: Nestlé Conservation Area;
- The creation of new public linkage routes to the east of the site, to assist facilitating development, not prejudicing it; and
- The delivery of a range of financial benefits to public sector bodies including New Homes Bonus, Council Tax generation, Business Rates, Zero Carbon Homes, Community Infrastructure Levy (CIL) and other site specific planning obligations.

1.4 The purpose of this statement is to assess the planning issues raised by the development proposals on the application site (“the Application Site”). It also identifies and describes the key opportunities presented by the proposed development (“the Proposed Development”) and assesses the proposals against relevant planning policies, and its conformity with the Development Plan.

1.5 This statement provides information to support and justify the proposals in planning policy terms and is structured as follows:

- Section 2 – The Application Site, History and Background;
- Section 3 – Pre-Application Consultation;
- Section 4 – The Proposed Development;
- Section 5 – Planning Policy Context;
- Section 6 – Assessment of Relevant Planning Issues;
- Section 7 – CIL and Planning Obligations Heads of Terms; and
- Section 8 – Conclusion and Summary of Benefits.

Background

- 1.6 The factory site was previously occupied by Nestlé for the production of coffee and chocolate, as part of its UK operations. In 2012, Nestlé announced the planned closure of the Hayes plant and the transfer of the whole of its UK coffee operation, including manufacturing, filling and packing to Tutbury in Derbyshire, where a new manufacturing facility has been built to provide the modernisation and flexibility in production that the company requires. Manufacturing on the Nestlé Hayes site finished in late 2014.
- 1.7 SEGRO purchased the factory site from Nestlé in early 2015 and leased back the factory to Nestlé until October 2015. Following SEGRO's acquisition of the land, it sought a development partner to deliver residential uses alongside its own industrial development as part of the sustainable redevelopment of the former Nestlé factory site. Barratt London (BL) was appointed as residential developer in December 2015.
- 1.8 Since then, SEGRO and BL have worked closely with the project team and key stakeholders to prepare proposals that are the subject of this planning application, to deliver an exemplar development, thinking creatively on how new homes and industrial/commercial development can successfully co-exist, given the ever growing pressure for competing uses to be delivered on land within London.

Applicant Information

SEGRO PLC

- 1.9 SEGRO is a UK Real Estate Investment Trust (REIT). This means it has a long term interest in its property portfolio as opposed to being a short term developer. SEGRO is a leading owner and developer of modern warehousing and light industrial property around population centres and key transport hubs across Europe – principally in UK, France, Germany and Poland. It owns or manages approximately 5.7 million square metres of space in £6 billion of assets and has 1,200 customers from a wide range of industry sectors. In the UK, SEGRO is predominantly based in the Thames Valley and West London.
- 1.10 Established in 1920, SEGRO is proud of its 97 year heritage and it has a broader relationship with the communities in which it operates. SEGRO provides

employment opportunities and works with local authorities to deliver training for the local communities and businesses, examples being Slough Aspire on the Slough Trading Estate and Origin works.

Barratt London

- 1.11 BL is a market-leading residential developer, with over 30 years' experience in the Capital. It delivers over 2,000 new homes in London each year. It has a track record of delivery of new private and affordable homes and extensive experience of complex regeneration schemes on brownfield sites including refurbishments, mixed-use developments and joint ventures with both the public and private sectors.
- 1.12 As one of the foremost residential developers in London, BL is dedicated to working collaboratively with public and private partners to transform derelict sites, delivering new homes and prosperous and stronger communities.
- 1.13 It also has a long term interest in ensuring well managed and successful developments through the on-going management of residential units by BRAM, BL's property management company.

Vision

- 1.14 SEGRO and BL have a shared vision to provide an exemplar scheme that demonstrates how best to redevelop a former industrial site on the edge of London, meeting the GLA's objective of delivering high quality, mixed use development that successfully combines jobs, housing, open spaces and community facilities. With this in mind the primary objectives for the site are:
- To create a successful and sustainable place for people to live, work and play, that can enjoyed by the community and wider public;
 - To provide a mix of new buildings that are fit for purpose as well as refurbishment/retention of existing on-site structures, retaining those buildings of historical interest and value and the need to enhance the character of the conservation area;
 - To deliver an appropriate density of dwellings, capitalising on the opportunities offered by existing transport links, the imminent arrival of a new Crossrail station and the existing facilities of Hayes town centre;
 - To provide a range of fit for purpose industrial and commercial buildings that meet the requirements of modern day business occupiers;

- To achieve a successful relationship between the residential and employment uses within the scheme whilst recognising that they will be delivered, occupied and managed as separate developments and which facilitates such development and future connections to the east in particular;
 - To provide a mix of supporting community and service based uses;
 - To meet the requirements of sustainability and energy policies;
 - To provide a catalyst for future redevelopment as part of a wider vision for the area; and
 - To open up the site and allow public access, including to the Grand Union Canal for the first time.
- 1.15 To deliver this vision, SEGRO and BL have employed an experienced project and architectural team to work collaboratively to prepare and deliver detailed design proposals.

Structure of Planning Application

- 1.16 SEGRO and BL are specialist developers of industrial and residential property respectively. On this occasion they are joint applicants seeking planning permission for the proposed development. Whilst a single detailed planning permission is sought, the residential and employment elements of the proposed development will be implemented separately, as standalone developments in their own right. The design of the scheme has therefore been formulated specifically to achieve this whilst ensuring a successful and consistent design overall. A planning permission is therefore required that gives the flexibility for each developer to implement and build out its part of the proposed development separately and without delay.
- 1.17 The site ownership boundary is split between the two developers and is shown on figure 1 below. A red line plan of the site is provided at **Appendix 1**.



Figure 1 – Site Area

- 1.18 The masterplan for the site has been developed collaboratively between the applicants, however, the detailed design of the two elements of the scheme has been undertaken by separate design teams, drawing on their respective residential/industrial specialisms, so that the full aspirations of the masterplan can be achieved. Makower Architects is the lead masterplan architect for the site as a whole. The detailed design of the residential plots is split between Hawkins Brown, dMFK and Makower Architects. The employment part of the proposal has been designed by Michael Sparks Associates. Landscape design has been led by Gillespies for the residential proposals and TALA for the industrial scheme. The design team has worked together to produce a detailed scheme that reads as one development overall, with specialist skills co-ordinated to deliver a cohesive masterplan.
- 1.19 SEGRO and BL have each appointed project teams who specialise in either residential or industrial development. Given the particular specialist set of skills required to design and advise on the different types of development proposed in this application, separate consultants have been appointed to advise on many of the technical aspects required to be addressed in justifying the proposed development.
- 1.20 As a result, separate technical reports have been prepared on a number of disciplines, so that specific issues as they relate to each of the residential and

industrial elements are dealt with by the relevant expertise. Where two reports have been prepared for each technical discipline, a joint executive summary has been prepared to confirm which part of the scheme the reports relate to and how the two elements of the scheme function together. The table below explains the structure of the application.

Documents for Approval

1.21 This Planning Statement is intended to be read in conjunction with the following formal planning application documents:

- The 1APP Planning Application Form;
- The land ownership and agricultural holdings certificate;
- CIL Liability Form;
- Design and Access Statement (see details in the table below); and
- Detailed drawings and plans as set out in the schedule at **Appendix 2**.

1.22 Supporting information is provided in the documents shown in Table 1 below. The supporting information detailed in the table has been prepared in line with both the national and local validation checklists. The list of documents forms part of a Planning Performance Agreement (PPA), which has been agreed and signed by LBH, SEGRO and BL.

Supporting Document	Notes
Arboricultural Impact Assessments and Tree Survey	Prepared by Tala for SEGRO and Aspect for BL.
Affordable Housing Statement	Prepared by Gerald Eve for both SEGRO/BL.
Air Quality Assessment	Prepared by PBA for both SEGRO/BL – This document is submitted as part of the Environmental Statement (see below).
Archaeological Desk Based Assessment	Prepared by CgMS for both SEGRO/BL.
Aviation Report	Prepared by Osprey for BL only as this report is only relevant for the residential part of the scheme, given building heights.
Construction Management Plans	Prepared by Pace for SEGRO and prepared by BL for the residential part of the scheme.

Daylight and Sunlight Assessment	Prepared by Point2 for both SEGRO/BL.
Demolition Reports	Prepared by Capita for SEGRO and Elliot Wood for BL.
Design and Access Statement	A joint, comprehensive statement prepared by Makower Architects, Hawkins Brown, dMFK and Gillespies for BL and Michael Sparks Associates and Terry Anderson Landscape Architects for SEGRO. A joint Access Statement has been prepared by David Bonnett Associates. The DAS also includes a Housing Statement and operational waste strategy.
Ecological Reports	Prepared by Aspect for BL and by Richard Kilshaw Survey for SEGRO, with a joint cover statement prepared by Aspect.
Economic Statement	Prepared by Barton Willmore for both SEGRO/BL.
Equalities Impact Assessment	Prepared by Barton Willmore for both SEGRO/BL.
Energy Statements	Prepared by BBS for Barratt London and by WPP for SEGRO.
Flood Risk/Drainage Assessments	Prepared by Hydrock for BL and by Capita for SEGRO.
Health Impact Assessment	Prepared by Barton Willmore for both SEGRO/BL.
Heritage Assessment	Prepared by Turleys for both SEGRO/BL. This document is also submitted as part of the Environmental Statement (see below).
Land Contamination Assessments	Prepared by Hydrock for BL and by Capita for SEGRO. These documents are submitted as part of the Environmental Statement (see below).
Lighting & CCTV Reports	Prepared by WPP for SEGRO and Whitecode for BL.
Noise and Vibration Reports	PBA has prepared three reports for both SEGRO and BL: 1) Noise and Vibration Planning Strategy; 2) Industrial Noise Report; 3) Residential Noise and Vibration Report.
Site Waste Management Plan	Prepared by Pace for SEGRO and prepared by BL for the residential.
Statement of Community Involvement	Prepared by HardHat for both SEGRO and BL.

Sustainability Statements (including Overheating Reports)	Prepared by WPP for SEGRO and BBS for BL.
Structural Survey and Conditions Report	Prepared by Elliot Wood for both SEGRO and BL.
Townscape and Visual Impact Assessment	Prepared by Barton Willmore for both SEGRO and BL.
Transport Assessment	Prepared by Markides Associates (with input from PBA) for both SEGRO and BL.
Travel Plans	Framework Travel Plan prepared by PBA for SEGRO and Residential Travel Plan by Markides Associates for BL.
Utilities Assessments	Prepared by WPP for SEGRO and Whitecode for BL.
Ventilation & Extraction Report	Prepared by WPP for SEGRO and by Whitecode for BL.
Wind Assessment	Prepared by RWDI for BL only as this report is only relevant to the residential part of the scheme.

Table 1: Schedule of Planning Application Documents

Environmental Impact Assessment

1.23 A request for an Environmental Impact Assessment (EIA) Screening Opinion was submitted by Barton Willmore on 12 May 2015. The London Borough of Hillingdon (LBH) confirmed in correspondence dated 29 June 2015 (see **Appendix 3**) that the proposed development required an Environmental Impact Assessment to be undertaken. The scope of the Environmental Statement was subsequently agreed with LBH in correspondence dated 13 May 2016 (see **Appendix 3**), and confirmed that it should address traffic & transport, air quality, contamination & ground conditions. Built Heritage was added to the list of topics to be assessed in the ES given the designated and non-designated heritage assets on site.

1.24 The format of the accompanying EIA Environmental Statement is set out in Table 2 below.

Environmental Impact Assessment	
Introduction	Prepared by Barton Willmore for both SEGRO/BL.

EIA Methodology	Prepared by Barton Willmore for both SEGRO/BL.
Site and Development Descriptions	Prepared by Barton Willmore for both SEGRO/BL.
Alternatives and Design Evolution	Prepared by Barton Willmore for both SEGRO/BL.
Construction Methodology & Phasing	Prepared by Barton Willmore for both SEGRO/BL.
Transport and Access Chapter	Prepared by Markides Associates (with input from PBA) for both SEGRO and BL.
Air Quality Chapter	Reports have been prepared by PBA for both SEGRO and BL.
Land Contamination Chapter	Prepared by Capita for SEGRO and Hydrock for BL.
Built Heritage Chapter	Prepared by Turleys for both SEGRO/BL.
Summary and Residual Effects	Prepared by Barton Willmore for both SEGRO/BL.
Non-Technical Summary	Prepared by Barton Willmore for both SEGRO/BL.
Technical Appendices and Transport Assessment	Reports from consultants identified above.

Table 2: Schedule of Environmental Statement Content

- 1.25 In terms of the EIA regulatory framework, this planning application will continue to be governed by the 2011 EIA regulations and will not be subject to the new regulations and their requirements, which come into force on 16 May 2017. This is the case as the transitional provisions state that where an applicant has requested a Scoping Opinion before the new regulations are introduced, then the application will be subject to the 2011 regulations.

Summary

- 1.26 Planning permission is sought for the comprehensive redevelopment of the former Nestlé factory site. A full package of planning application documents is submitted in support of the proposals that meets LBH's local application validation requirements together with national validation requirements. An Environmental Impact Assessment has also been undertaken, the scope of which has been agreed with LBH.

2.0 The Application Site, History and Background

Site Location and Description

- 2.1 The site is located at the former Nestlé factory, Nestles Avenue, Hayes, UB3 4RF, in the southern part of LBH, west London. It is located approximately 500 metres to the south-east of Hayes Town Centre, bounded to the north by the Great Western Rail Line and Grand Union Canal and to the south by Nestles Avenue. To the west is the existing Squirrels Industrial Estate, accessed from Viveash Close and to the east is North Hyde Gardens, which is a public road. To the north east of the site is Hayes and Harlington Railway Station. See site plan at **Appendix 1**.
- 2.2 A residential area lies immediately south of the site, on the opposite side of Nestles Avenue. The A312 (North Hyde Road) is located approximately 140m to the south of the site and the M4 motorway is a further 1km. Heathrow Airport is approximately 4km to the south.
- 2.3 The former Nestlé factory site extends to 12.28 ha and contains a number of existing buildings and structures amounting to approximately 91,000 sq m (GEA) that form part of its previous factory use. The buildings were used for a range processes in relation to the production of coffee and chocolate production and vary in size and scale and associated staff facilities, with the tallest elements rising up to 75 metres AOD. A plan of the site showing the layout of the existing buildings is shown on Figure 4 below.
- 2.4 Railings enclose the site, with mature trees along the southern frontage on Nestles Avenue and green spaces that were once part of the site's "factory in a garden" setting. Other parts of the site are characterised as storage areas, service yards and car parking areas. The topography of the site is generally flat, ranging between 25-35m Above Ordnance Datum (AOD).
- 2.5 The site is accessed from North Hyde Gardens to the east with other historic accesses from Nestles Avenue to the south and is well served by public transport. The current Public Transport Accessibility Level (PTAL) varies across the site, ranging from 2 in the east and 3 in the west, however, this will rise to a maximum of 4 (on the cusp of 5) at the western part of the site when the new Crossrail service opens at Hayes and Harlington station.

2.6 The site is located within the Botwell: Nestles, Hayes Conservation Area which was first designated by LBH on 19 June 1988, partly in response to an increased amount of demolition on the site which, was considered to affect its special character. A map of the current boundary of the conservation area is shown in Figure 2 below. The boundary of the application site roughly coordinates with that of the conservation area and comprises the whole of the former Nestlé factory site.

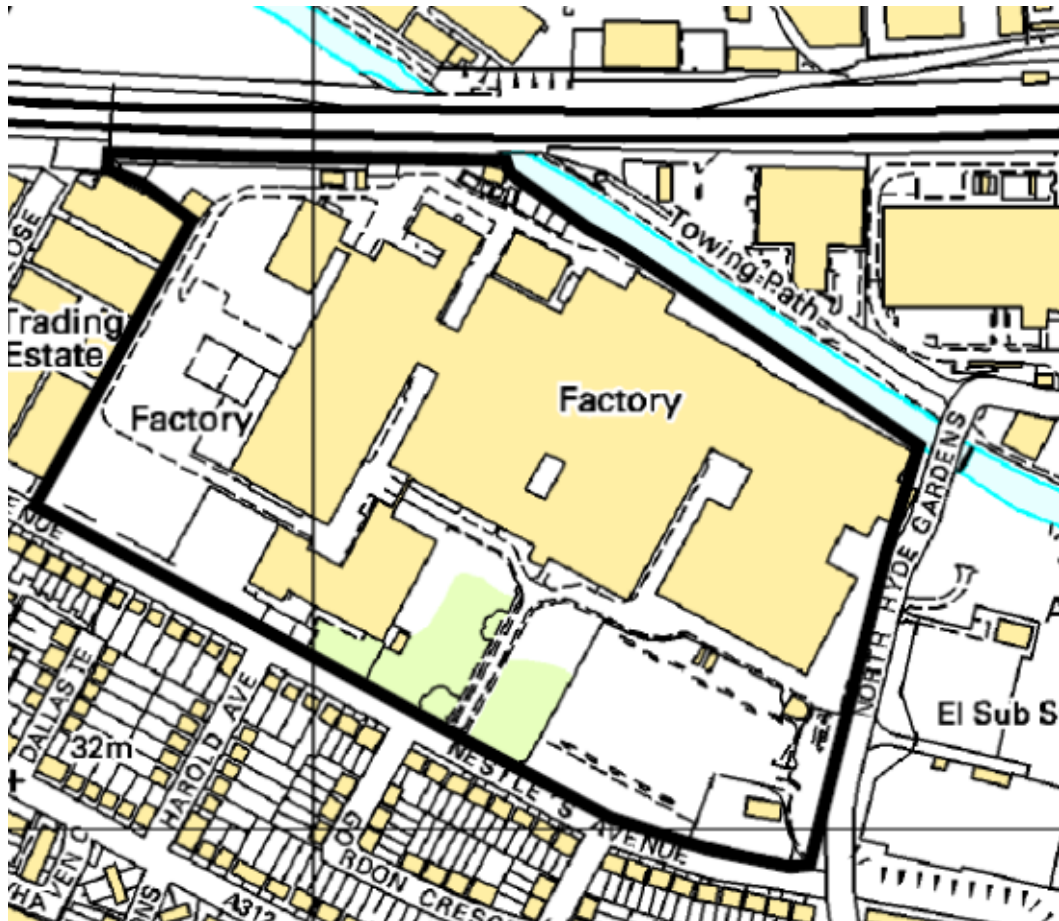


Figure 2 – Botwell: Nestlé, Conservation Area

2.7 There are four locally listed buildings on the site which form part of the former Nestlé Factory as highlighted in Figure 3 below. These are as follows:

- Nestlé Works (Nestlé UK Ltd) which is described as the 1930s factory by Wallis Gilbert, outlined in blue;
- Nestlé Works: former canteen (Nestlé UK Ltd) outlined in green;
- Nestlé Works gates/railings (Nestlé UK Ltd) outlined in red; and
- Nestlé Works: lodge (Nestlé UK Ltd) outlined in orange.

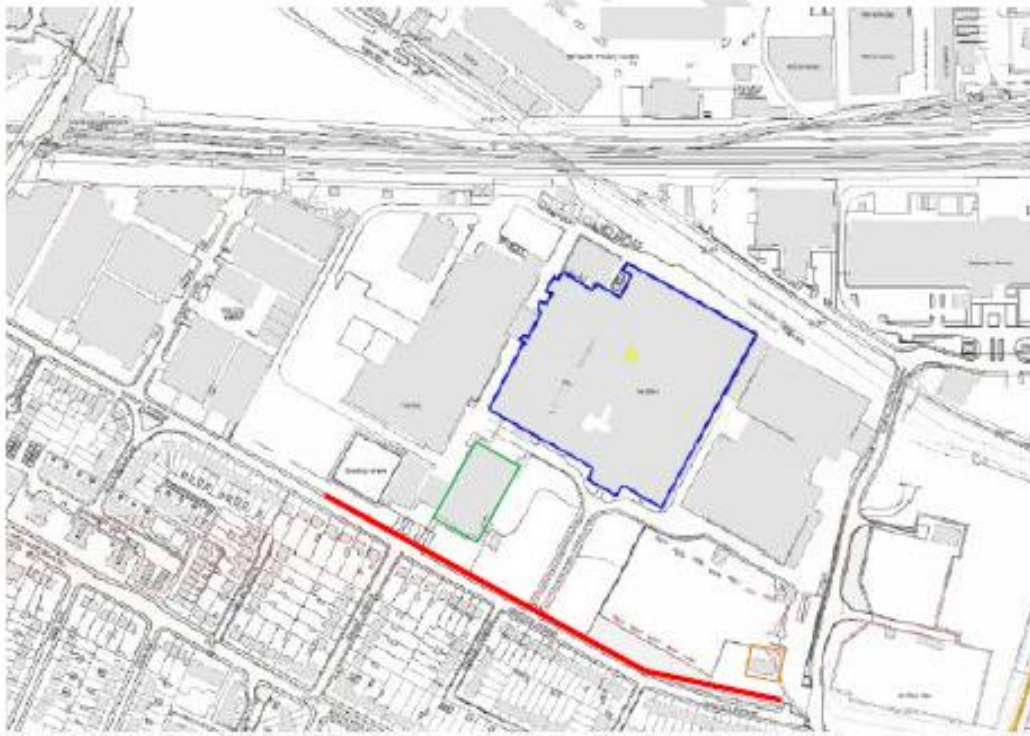


Figure 3: Locally Listed buildings/structures

- 2.8 Also of local interest on the site is a war memorial, which was previously on display in the entrance hall of the main factory building. The memorial commemorates members of staff who lost their lives in World War 2 and is an important part of the factory's history. The memorial is currently in safe storage whilst the factory is vacant. The intention is for it to be re-housed in an appropriate location within the residential part of the site.
- 2.9 As noted in Section 1, in 2012, Nestlé announced the planned closure of the Hayes plant with SEGRO purchasing the factory site in early 2015 and leasing the factory back to Nestlé until October 2015.

Planning History

- 2.10 The site has an extensive planning history, with LBH's online records dating back to the 1970s. Many of the existing buildings pre-date the online records, dating back to as early as 1914. It is assumed that the main factory building and other older structures were immune from planning control by virtue of preceding the 1947 Town and Country Planning Act, except where subsequent changes have been sought. Due to this background, the planning history files do not provide a comprehensive explanation of all the buildings on site and that no single planning permission exists for the majority of built development.

- 2.14 The site is located in Hayes, which is a key area of strategic growth and forms part of the London Plan Heathrow Opportunity Area, which covers an area of approximately 700 ha. The Opportunity Area has an indicative employment capacity of 12,000 new jobs and the potential to create 9,000 new homes. The London Plan also specifically recognises the Hayes-West Drayton corridor as being able to offer a range of redevelopment opportunities, including small business parks, logistics and mixed uses.

Housing Zone

- 2.15 In March 2016 the Mayor selected Hayes Town Centre as one of 31 new Housing Zones in London. This is an initiative undertaken in partnership with London boroughs and their development partners as part of the GLA's Housing Strategy.

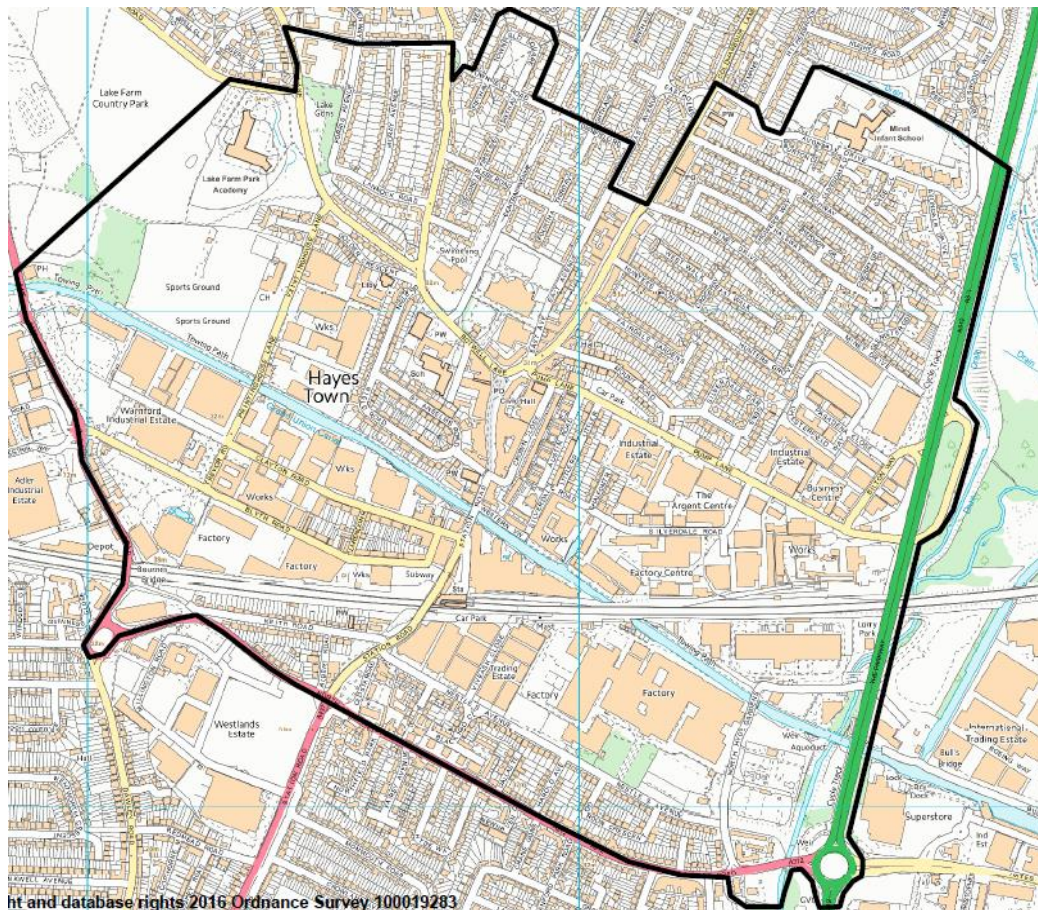


Figure 5: Hayes Town Centre Housing Zone

- 2.16 A total of £600 million in funding has been made available by the Mayor and government for the construction of 75,000 new homes. In Hayes, the GLA anticipates a total investment to the value of £1 billion, with £39 million of funding from the GLA. It is anticipated that, 2,788 new homes will be delivered,

including 847 affordable dwellings within the 238 hectares Hayes Town Centre Housing Zone area. The Housing Zone area is shown in Figure 5 above.

- 2.17 The purpose of a Housing Zone is to support the delivery of homes, through ensuring the delivery of infrastructure required to maximise housing density. Development within the Housing Zones is expected to be expedited, with local planning authorities working proactively with developers to ensure a smooth planning and delivery process.
- 2.18 The GLA and LBH have commissioned a Development Infrastructure Funding Study (DIFS) study, to understand the requirements for the provision of new physical and social infrastructure within the Housing Zone and how the additional funding secured as a result of the Housing Zone designation can be utilised to deliver this infrastructure in addition to CIL and S106 commitments. The applicants have contributed to the production of the study through both funding and information sharing.

Emerging Site Specific Allocation and Wider Masterplan

- 2.19 The site is allocated as a protected industrial and business area in the 2007 Saved Unitary Development Plan policies. However, there is an emerging land use policy context for the site and surrounding area, which is consistent with the strategic planning policy framework, therefore whilst adopted policy should be regarded, parts of the emerging policy position should have considerable weight attached to it.
- 2.20 The site benefits from an emerging site allocation within the Submission Version of the Hillingdon Local Plan: Part 2 (October 2015), Policy SA5 – land to the South of the Railway, including Nestlé Site.
- 2.21 The site is allocated for development with two adjacent sites to the west as shown in Figure 6 below. Further details of the emerging site allocation is provided in Section 5.



Figure 6: Site SA5 – Land to the South of the Railway, including Nestlé Site

Wider Masterplan

- 2.22 The strategic nature of the site, its location within the Heathrow Opportunity Area and the context of the Housing Zone has led to the GLA commissioning a wider masterplan of the Policy SA5 allocation site (the draft OAPF Masterplan), liaising with the developers and owners of Sites A (SEGRO/BL), B (Squirrels Trading Estate) and C (Access/Precis/Bucleuch and Network Rail). Site A is the former Nestlé factory site, which seeks a mixed use development providing both residential and employment uses, and is the subject of this planning application.
- 2.23 The wider masterplan provides a set of design parameters for the SA5 site, seeking to ensure that a cohesive development strategy is delivered and one that follows three principles:
- 1) to bind the three sites together by a single linear public space:
 - 2) to share similar development scales and grain; and
 - 3) a generous approach to creating high quality new public realm and amenity space.

The mix and quantum of proposed development also seeks to capitalise on the significant public investment in Crossrail, which is due to be accessible from Hayes and Harlington Station from May 2018. Figure 7 below, shows the wider masterplan principles, which have been developed by the GLA.

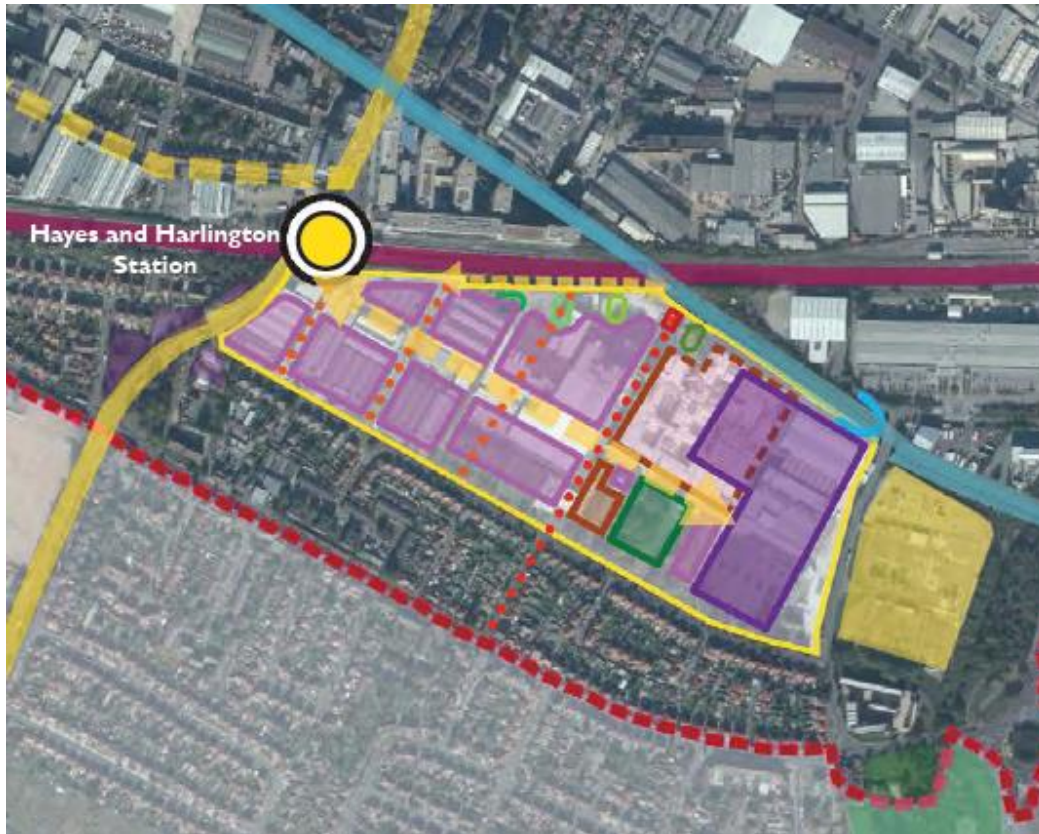


Figure 7: Site SA5 – Wider Masterplan Strategy

- 2.24 The draft OAPF Masterplan seeks to establish a new east-west route through the heart of the Application Site, connecting the historic Nestlé factory core with the station and the high street to the east. The canal edge at the north of the site would also be opened up, supporting connections with the wider Blue Ribbon Network and Green Chain corridors provided by the Crane Valley to the east.

Emerging Local Plan

- 2.25 As noted above, there is an emerging planning policy context for the wider Hayes town centre area. LBH has been preparing a review of its Local Plan Part 2, to ensure that site specific allocations and development management policies reflect the strategic regeneration aspirations for the area.
- 2.26 LBH has already consulted on its Site Allocations and Designations, Development Management Policies and Policies Map. All three documents are due to be submitted to the Secretary of State shortly for Examination in Public. As these documents have been through a number of public consultation exercises, considerable weight should be given to the principle of the redevelopment of the site for a mix of uses, including residential.

- 2.27 The applicants have been active participants in the preparation of the Local Plan Part 2 documents, submitting representations to the consultation documents in December 2015. The key points made in the representations relate to the emerging site allocation for the site contained in Policy SA 5 and the fact that the policy very significantly underplays the development capacity on the site. A copy of the representations are provided at **Appendix 5**. The applicants' concerns in respect of the site allocation, regarding the principle of residential use of the site, are detailed further in Section 6

Summary

- 2.28 The site is a former factory located on brownfield land, with an historic planning policy allocation seeking the protection of employment uses, within a conservation area. The emerging land use planning context is to secure wider regeneration, the provisions of which are provided by a strategic planning policy framework and emerging allocation for residential/employment led uses.

3.0 Pre-Application Consultation

3.1 This section sets out details of the pre-application consultation and community involvement that SEGRO and BL has undertaken prior to the submission of the planning application. This section should be read in conjunction with the accompanying Statement of Community Involvement, prepared by HardHat.

3.2 The applicants have engaged with LBH and the Statutory Consultees during the design process and will continue to engage with all parties once the full planning application is submitted. The following bodies have been engaged in pre-application discussions:

- Greater London Authority (GLA);
- Transport for London (TfL);
- Historic England (HE);
- Environment Agency (EA);
- London Heathrow Airport (LHR);
- Canals and Rivers Trust (CRT); and
- Metropolitan Police Crime Prevention (MPCP).

3.3 Details of the pre-application engagement held with the organisations listed above is summarised below. The pre-application engagement with the EA is detailed as part of the Environmental Impact Assessment process in the ES and in the submitted Flood Risk Assessment and Drainage Strategy documents.

London Borough of Hillingdon

3.4 Pre-application discussions have been held with LBH over a two year period, commencing in summer 2015. The proposed masterplan for the site's redevelopment has been presented and submitted to officers on a number of occasions. When SEGRO first purchased the site, it prepared an illustrative masterplan in consultation with LBH officers and members. The intention was to reach broad agreement on site layout, so that SEGRO could then attract a residential development partner who would have some certainty over the likely acceptable scheme that could be progressed. Details of the scheme and the design development process involved in preparing the detailed proposals is explained further in the Design and Access Statement.

3.5 Since the original masterplan was prepared, a number of meetings were held with LBH officers in October 2015, November 2015, December 2015, January 2016, February 2016, March 2016 and May 2016.

3.6 Formal comments were issued by LBH in correspondence dated 28 June 2016, 22 July 2017 and 17 January 2017.

28 June 2016 Letter

3.7 This letter set out LBH's initial comments on the proposals, in summary, it commented on the following issues:

- **Principle of Development** – This has been confirmed as acceptable in the context of the emerging site allocation;
- **Conservation and Heritage** – comments relating to the extent of the retention of the locally listed structures on the site and the impact of the proposals on the conservation area were made;
- **Overall Masterplan Design** – Considering the design and layout of the scheme, the principle of tall buildings and crime prevention;
- **Residential Accommodation** – Including amenity, conformity with the Mayor's Housing Standards, density and housing mix;
- **Commercial/Industrial Uses** – The industrial scheme has been confirmed as acceptable in terms of provision and quantum;
- **Highways** – Commentary on public transport, traffic impact, car parking, access and road layout and potential mitigation improvements;
- **S.106 Planning Contributions & CIL**- Including affordable housing, transport mitigation, open space, community facilities, employment and construction training, public art and noise mitigation; and
- **Environmental Matters** – Including flooding and sustainable drainage, land contamination, waste management, sustainability, water resources and noise.

22 July 2016 Letter

3.8 A further letter was issued by LBH on 22 July 2016, responding to additional information submitted by the applicants. This letter specifically commented on the following topics:

- **Conservation and Heritage** – Including the extent of the retention of the locally listed structures on the site and conversion of the main factory building for residential purposes as well as viability;
- **Supporting Facilities** – Commentary on school provision in the area and future studies to assess demand for school places;
- **Housing mix** – Demand for 3 bed units; and
- **Highways** – Confirmation that LBH would respond on points for clarification, including the methodology of assessing traffic impact.

3.9 Throughout 2016, there were a number of scheme iterations and a re-appointment of the design team to develop an appropriate masterplan for the site. The evolution of the scheme was heavily influenced by LBH in pre-application consultation, which led to additional scheme changes in January/February 2017. A summary is provided below.

18 January 2017 Scheme Response

3.10 A note was issued by LBH setting out detailed design comments on the proposed scheme. The design team reviewed the pre-application note and responded to the comprehensive comments by letter dated 8 February 2017, explaining where the scheme had been amended and the justification for the masterplan approach. This response provided a detailed critique of the scheme and provided a number of issues to consider.

20 February 2017 Proposed Scheme Changes

3.11 A set of illustrations were issued by LBH setting out suggested design changes to the scheme and amendments to the scheme were made at LBH's specific request. These changes included the reconfiguration of some of the proposed buildings, changes to height, changes to proposed materials and amendments to the landscape layout. It was understood at the time that with these changes made, the Masterplan proposals were agreed. Further details of how the scheme has evolved and responded to specific comments made by LBH is set out in the accompanying Design and Access Statement.

4 May 2017 Additional Comments

3.12 LBH issued a further letter on 4 May 2017, just prior to the submission of the planning application, commenting on heritage matters in the masterplan, affordable housing, planning obligation mitigation measures and other topic areas where further information is required, such as the energy approach and

noise. The documents accompanying the application provide information on the points raised in the letter by LBH and the applicants will discuss these further during the determination period.

- 3.13 Following extensive pre-application discussions and negotiations LBH officers have given its broad support for the masterplan, subject to balancing the overall planning benefits provided by the scheme against the approach taken to heritage assets.

Greater London Authority and Transport for London

- 3.14 The Proposed Development is referable to the Mayor of London due to the scale of development proposed, i.e. it exceeds a number of the development thresholds set by the Mayor, which are:

- The development proposes more than 150 residential units;
- More than 15,000 sq m of building(s) are proposed (as the site is outside central London);
- Some of the buildings proposed exceed more than 30 metres in height; and
- The development occupies land of more than 4 hectares, which is used for Use Class B2 (general industrial).

- 3.15 The applicant team met with the GLA in formal pre-application meetings on 25 August 2016, 18 January 2017, 8 February 2017 and 7 March 2017. The GLA, provided its formal pre-application response on 24 October 201 and a further response is expected in May 2017.

24 October 2016 Pre-Application Report

- 3.16 The feedback from the GLA was extremely positive. The report confirmed that the proposals to provide employment and residential uses is strongly supported in strategic planning terms, in line with the aspirations of the emerging Heathrow Opportunity Area Planning Framework (OAPF) and the Hayes Town Centre Housing Zone.
- 3.17 The GLA noted that the masterplan responds very well to the draft OAPF design principles and would successfully manage the critical interface between residential, mixed use historic core and commercial employment uses. It was

recognised that the arrangement of the proposed masterplan would also deliver considerable benefits in terms of improvements to secure access to the Grand Union Canal and provision of amenity areas.

- 3.18 The scale of the Proposed Development was noted to accord with the draft OAPF and would be successful in optimising the development potential of the site, providing an appropriate response to the varying site edge conditions. The GLA supported up to 15 storeys in height for the residential buildings. It was noted that the level of affordable housing provision was to be agreed and referred the applicants to the Mayor's draft Housing SPG (which was not published at the time of the pre-application meeting).
- 3.19 In terms of the historic environment, the report noted that a favourable balance has been struck between the loss and retention of the locally listed buildings within the conservation area, having regard to the proposed public benefits of the scheme.
- 3.20 The GLA strongly supported the proposal to retain the façade of the main factory building and "art deco" inspired entrance tower, the reconstruction of the Sandow building and the retention of the former canteen. The GLA also supported the proposed demolition of the former caretaker's lodge.
- 3.21 On transport, it was noted that TfL would support a car parking ratio as low as 0.4 spaces for each residential unit as this would respond positively to the arrival of Crossrail in May 2018. It noted that LBH is undertaking a review of on street car parking in the area, with a view to introducing a Controlled Parking Zone (CPZ) on the adjacent roads, which it also supported.
- 3.22 Further feedback was also received on energy, climate change and noise and vibration, which have informed other relevant documents submitted in support of the planning application.
- 3.23 Overall, the report concluded that *"the proposed mixed use redevelopment of a vacant industrial site, to provide both new employment space and new homes, as part of a heritage-led masterplan, is supported in strategic planning terms...the approach taken on this site represents an exemplar for other major growth corridors in London (such as Crossrail 2) – through the successful*

consolidation of employment land, and sustainable integration of large scale commercial elements with high density housing in a highly accessible location”.

- 3.24 A copy of the GLA’s pre-application response is provided at **Appendix 6**

Transport for London

- 3.25 Meetings were held with Transport for London (TfL) on 8 June 2016 and 2 March 2017, where the approach to the assessment methodology in the Transport Assessment, traffic modelling requirements, walking & cycling, car parking, public transport, servicing and travel plans were discussed and agreed. A copy of TfL’s formal response is provided at **Appendix 7** and further details of how the scheme responds to the comments received are set out in the submitted Transport Assessment, prepared by Markides Associates.

Historic England

- 3.26 The applicant team met with Historic England (HE) on 21 April 2016 (on site), 11 August 2016 and 21 September 2016, seeking to gain its feedback and contribution to masterplan proposals, in the context of its potential effects on heritage assets and locally listed buildings. HE provided three formal written pre-application responses, dated 12 May 2016, 8 September 2016 and 17 October 2017. Copies of HE’s pre-application consultation responses are provided at **Appendix 8**.
- 3.27 The accompanying Design and Access Statement and Heritage Statements provide details of how HE’s feedback influenced the design evolution of the scheme, however, in summary, the following points were made in the consultation process in relation to the heritage aspects of the scheme:
- **Conservation Area** – HE’s view is that the Conservation Area is characterised by:
 - The aesthetic value of the modernist “Truscon” Nestlé Factory by Wallis Gilbert & Partners and the modern Canteen building, which share an architectural language. The townscape character of the site as expressed by its high-quality boundary railings, tree-lined driveway and canalside setting;

- The historical value of the Conservation Area as an example of the industrial development around the Hayes canal and train station. The remaining open spaces around the factory hint at the original “factory garden” philosophy behind the Nestlé development and this adds to its historical value; and
 - The communal value of the Nestlé factory site (particularly the buildings visible from the public realm such as the canteen, lodge and factory) as a famous brand and local landmark to the Hayes community.
- **Main Factory Building** – The factory lies at the heart of the Conservation Area, with the south, east and west façades being the most important. It was recognised that there are a number of additions to the factory that detract from the architectural integrity of the building, with the one exception being the c.1960’s entrance tower at its south eastern corner. In responding to the development proposals for the main factory building, HE noted *“This demonstrates a greatly improved understanding of the conservation area’s significance which has clearly influenced the design approach and presented opportunities to enhance its character”*.
 - **Canteen** – The canteen is noted as an attractive Art Deco building with strong historical and communal associations with the Nestlé factory. HE welcomed the proposed retention of the canteen building as a result of pre-application discussions, which include the repair and reuse of its separate entrance gates and the retention of its lofty internal hall space and external colonnade.

3.28 Overall, in HE’s final feedback letter dated 17 October 2016, HE welcomed the various revisions to the scheme and noted that it:

“...welcomes the various revisions to the scheme and the collaborative approach that has been taken with us throughout the pre-application process. We recognise that various efforts are being made to ‘preserve and enhance’ the character of the Conservation Area...we do, however, maintain that some harm to the Conservation Area will inevitably be caused to the overall integrity of the site and particularly the Truscon building in the proposed land uses. It is for

the Local Planning Authority to be convinced that this harm is justified, and outweighed by public benefits in accordance with Paragraphs 132 and 134 of the National Planning Policy Framework..."

- 3.29 The accompanying Design and Access Statement and Heritage Statement provide details of how HE's feedback influenced the design evolution of the scheme.

Heathrow Airport

- 3.30 The site is located within the London Heathrow (LHR) Aviation Safeguarding Zone and therefore a pre-application meeting was held with the LHR safeguarding team on 18 August 2016, to discuss the upper limitation of building heights that could be provided on the site. It was confirmed in correspondence dated 13 October 2016 that the maximum building height on the site should be no greater than 67.93 m AOD.
- 3.31 Pre-application advice has also been given in relation to landscape planting, building & roof design and ecology. The masterplan proposals have been developed and co-ordinated to take on board these comments, so that the landscaping and building design (such as roofs) does not attract birds that could affect LHR's operations.
- 3.32 Further details of the consultation process undertaken with LHR is provided in the Aviation Report prepared by Osprey, submitted with the planning application.

Canals and Rivers Trust

- 3.33 A meeting was held with the Canals and Rivers Trust (CRT) the owners of the adjoining Grand Union Canal on 16 March 2017, where the masterplan proposals were presented to gain initial feedback. Matters discussed included:
- Landscaping – CRT prefers native species and tree planting along its canals. The car parking proposed adjacent to the canal should be balanced by landscape softening;
 - Security – Passive surveillance over the canal towpath was recommended;

- Canal – CRT confirmed that surface water can be drained into the canal and that canal water can be used for heating and cooling (subject to entering into appropriate commercial agreements);
- Pedestrian Bridge – The potential for a pedestrian bridge crossing over the canal was discussed. Bridges are generally resisted by CRT, although if one is provided then the clearspan over the towpath is 2.7m and 3m over the water. Air rights fees would apply.
- Lighting – Overspill lighting on the canal corridor could affect some ecology and would need to be considered in the proposals.

Metropolitan Police Crime Prevention

3.34 The design team met with a Metropolitan Police representative on 14 December 2016, to discuss crime prevention measures to be integrated into the masterplan design. Feedback included:

- Video and intercom is required at the entrances to all of the residential buildings, with an air lock entry system providing inner and outer lobbies to access lifts;
- Street lighting should be white LED as this is usually more effective than orange lighting in reducing crime rates;
- Car parking entrances should have fully automated gates and the car parking areas should have well-lit sensor lights;
- Dome type CCTV should be provided;
- Shared community spaces should be shared and flexible, not rooms allocated to individual organisations to avoid enclaves; and
- The potential link to the station car park is supported, although recommends that any access is gated between 10pm and 6am.

Public Engagement

3.35 The accompanying Statement of Community Involvement (SCI), prepared by HardHat, details the consultation undertaken with local residents, businesses, community groups LBH as a local landowner and stakeholders in the community. This has included a varying programme of engaging with local stakeholders such as local politicians, leaders in the community, local businesses, resident groups and community members in a wide range of guises – public consultation, community open days, meetings and workshops.

Methods of Consultation

- 3.36 The consultation process provided informative material via a wide range of communication channels and platforms to ensure that messages reach residents. This included meetings, workshops, a community open day, a public exhibition, a website, a dedicated phone line and email address and newsletters and leafleting.
- 3.37 Three public consultation events have been held, with a community open day in June 2016, an initial exhibition in November 2016 and second exhibition taking place in May 2017. These are in addition to individual meetings with residents and key stakeholders. Details of these meetings are set out in the submitted SCI.

Feedback Received

- 3.38 Generally, the public supports the redevelopment of the vacant factory site, recognising that the site offers an exciting opportunity to provide new housing, employment and community space.
- 3.39 At the initial public exhibition, 73% of respondents said yes to supporting the proposals, which is reflective of the overall feedback and support in the comments received.

Summary

- 3.40 The applicants have undertaken extensive pre-application consultation and will continue to engage with LBH, Statutory Consultees, key stakeholders and the general public throughout the determination period of the planning application.
- 3.41 Further information of how the scheme's design has been influenced by pre-application discussions/engagement can be found in the Design and Access Statement and Heritage Assessment. Further details of public consultation can be found in the accompanying Statement of Community Involvement.

4.0 The Proposed Development

4.1 This section provides an overview of the Proposed Development and the key aims and objectives of the masterplan. The supporting Design and Access Statement should be read in addition to this statement as it provides a more detailed description of the scheme, the site's setting and how the scheme proposals have evolved through the design process.

4.2 The application seeks full planning permission and conservation area consent for demolition for the following:

"Part-demolition of existing factory buildings and associated structures, and redevelopment to provide 1,381 dwellings (Use Class C3), office, retail, community and leisure uses (Use Classes A1/A3/A4/B1/B8/D1/D2), 22,663 sq m (GEA) of commercial floorspace (Use Classes B1c/B2/B8 and Data Centre (sui generis)), amenity and playspace, landscaping, allotments, access, service yards, associated car parking and other engineering works".

4.3 The Proposed Development responds to the wider regeneration of the area, the strategic and emerging local planning policy context and increase in public transport accessibility arising from the imminent introduction of the Crossrail service at Hayes and Harlington Station. The proposals include the efficient re-use of brownfield land and will deliver a very significant amount of much needed new homes and jobs in the local area. In summary, the Proposed Development will deliver the following:

- Residential**
- A high quality designed residential scheme providing 1,381 residential apartments (Class C3) in buildings ranging from ground +3 to ground + 10 storeys.
 - Provision of on-site affordable housing, including London affordable rent and intermediate tenures.
 - A range of dwelling sizes, including studio, 1 bed, 2 bed and 3 bed units.
 - All dwellings meet or exceed GLA design standards.
 - Provision of 0.5 car parking spaces per residential unit, totalling 712 spaces at grade, in podium undercroft and at basement level.

- Provision of 2,186 cycle parking spaces.
 - Provision of an energy centre.
- Industrial**
- High specification units and highest quality design and façade treatments.
 - Range of planning uses, including B1(c)/B2/B8 & Data Centre (sui generis).
 - 24/7 Operation.
 - BREEAM Very Good.
 - 213 car parking spaces.
 - 72 cycle spaces.
- Community/
Support Uses**
- 2,986 sq m GEA (2,760 sq m GIA) of commercial/ community space in a range of flexible uses, including A1/A3/A4/B1/B8/D1/D2.
 - These uses are anticipated to include: children's day nursery/community facility, office suites, residents' management office, canoe club storage, gym and café.
- Heritage**
- Retention of southern, eastern and part of the western façades of the locally listed main factory building.
 - Refurbishment and enhancement of the locally listed former canteen building.
 - Enhancement to the character of the conservation area and preservation of Wallis Gardens.
 - Retention of locally listed railings and entrance gates.
- Landscape &
Amenity Space**
- Over 3 hectares of publicly accessible green and landscaped space, including 35,612 sq m of public open space, and 9,025 sq m of semi-private amenity space.
 - Creation of two new public parks with active play spaces and access to the Grand Union Canal.
 - Opening the site up to allow public access for the first time in the site's history.

- Re-use of a brownfield, vacant site into a high quality public environment.

4.4 The table below provides a summary of the proposed uses and quantum of development. A full accommodation schedule is provided at **Appendix 10**.

Use	GIA (SQM)	GEA (SQM)	Number of Units
Residential (C3)	110,727	120,487	1,381
Industrial/Commercial Units (B1(c)/B2/B8 and data centre)	21,884	22,663	4
Flexible Commercial/ Community Use (A1/A3/A4/B1/B8/D1/D2)	2,743	2,986	8-10
Total Habitable Floorspace	135,354	146,136	
Undercroft/Basement Car Parking	15,906	16,274	
Total Floorspace	151,260	162,410	

Table 3: Scheme Summary

Residential Provision

4.5 The residential scheme occupies the western part of the site in six blocks of development, with supporting non-residential uses contained within the former canteen building and the redeveloped parts of the main factory building. The industrial scheme is located at the eastern part of the site, contained within three buildings, which house 4 units. The layout is shown in Figure 8 below.



Figure 8: Masterplan Layout

4.6 Each building is broken down into separate development blocks, which have been designed by separate architects and shown on the key buildings plan drawing below.



Figure 9: Key Buildings Plan

Residential Provision

4.7 The scheme proposes a mix of residential units, ranging in size from studio apartments to 3 bedroomed duplexes, although 1 and 2 bedroomed units predominate the scheme. In total 1,381 dwellings are proposed, which represents 3,484 habitable rooms and 139 of the units are wheelchair accessible units, compliant with building regulations M4(3). The overall dwelling mix is shown in Table 5 below.

Unit Type	Number of Units	Percentage of Units %
Studio	111	8
1 Bed	575	42
2 Bed	557	40
3 Bed	138	10
Total	1,381	100

Table 4: Proposed Dwelling Mix

4.8 The number and mix of residential units in each development block, with habitable room count is shown in Table 5 below.

Block	Unit Type	Number of Units	Percentage of Units %	Number of Hab Rooms	Percentage of Hab Rooms %
B	Studio	34	7	34	3
	1 bed	192	39	384	31
	2 bed	218	44	654	52
	3 bed	46	9	184	15
	Total	490	100	1256	100
C	Studio	21	10	21	4
	1 bed	82	39	164	30
	2 bed	81	38	243	45
	3 bed	28	13	112	21
	Total	212	100	540	100
D	Studio	9	7	9	3
	1 bed	69	52	138	44
	2 bed	48	36	144	46
	3 bed	6	5	24	8
	Total	132	100	315	100
E	Studio	18	10	18	4
	1 bed	79	44	158	36
	2 bed	69	39	207	48
	3 bed	13	7	52	12
	Total	179	100	435	100
F	Studio	27	9	27	4
	1 bed	142	48	284	39
	2 bed	91	31	273	38
	3 bed	35	12	140	19
	Total	295	100	724	100
G	Studio	2	4	2	1
	1 bed	3	5	6	4
	2 bed	50	91	150	95
	3 bed	-	-	-	-
	Total	55	100	158	100
H	Studio	-	-	-	-
	1 bed	8	44	16	29
	2 bed	-	-	-	-
	3 bed	10	56	40	71
	Total	18	100	56	100
	Overall Total	1,381	100	3,484	100

Table 5: Residential Accommodation Schedule

Density and height

4.9 The total area of the site is 12.28 ha, split between the residential area (8.11 ha) and the industrial area (4.17 ha), as shown on Figure 10 below. The residential unit density has been calculated using the residential site area and associated landscaped open space only and is as follows:

- Site area – 8.11 ha
- Total number of residential units – 1,381
- $1,381/8.11 = \underline{170 \text{ dwellings per hectare}}$

- Total habitable rooms – 3,487
- $3,484/8.11 = \underline{430 \text{ habitable rooms per hectare}}$

4.10 The residential buildings comprise blocks B, C, D, E, F, G, H and I, as shown on Figure 9 above. The buildings vary in height between ground + 3 storeys and ground + 10 storeys. The taller buildings are generally located towards the northern part of the site adjacent to the canal and railway line, with lower rise buildings towards the south, although there is variation in heights of the buildings across the masterplan, to reflect the circumstances of the site. The tallest proposed building is Block B9, which is 35.965 m (67.865 m AOD), the height of which has been informed and set by aviation safeguarding restrictions.



Figure 10: Site Area

Affordable Housing

- 4.11 The masterplan has been designed as tenure blind, therefore at the point of the submission of the planning application, the overall location of affordable housing and tenure provision have not yet been determined.
- 4.12 However, in terms of quantum, the Proposed Development will meet LBH affordable housing policy by providing 35% affordable housing by habitable room. The proposed tenure split is in line with the Mayor's Draft Affordable Housing & Viability SPG (Route B) i.e. 30% low cost rent (London Affordable Rent), 30% intermediate product (shared ownership) and the remaining 40% also intermediate (shared ownership). It is also anticipated that 13% of 3 bedroomed family dwellings will be affordable, the majority of which will sit within the London Affordable Rent tenure. The proposed tenure mix and split is subject to further discussion and agreement with LBH.
- 4.13 Further information is provided in the accompanying Affordable Housing Statement prepared by Gerald Eve.

Residential Amenity

- 4.14 The proposed residential units have been designed to be high quality and to comply (and where possible to exceed) with the National Technical Standards and the Mayor of London's Housing Design Standards.
- 4.15 The internal layouts of the dwellings have been designed to provide living spaces that maximise views, ventilation and access to daylight and sunlight. Each dwelling is provided with private amenity space, either internalised or as a balcony or a terrace.
- 4.16 The dwelling provision has also been designed to address accessibility. All dwellings will meet Building Regulations Part M and 10% (139 units) of the new dwellings have been designed to be wheelchair adaptable. This will include units across all tenures.

Appearance and Design

- 4.17 The Proposed Development is seeking full planning permission and has been designed in detail by the project architects. The design and materials of the existing factory building have significantly influenced the scheme's appearance and design. The material palette, including the residential, industrial and

landscape has been developed and inspired by the existing factory buildings and their context. This has been coordinated as part of the masterplan process, whilst promoting diversity and avoiding homogeneity.

- 4.18 The new buildings will be predominately brick, ranging in tone from dark to lighter shades. The retained façades of the main factory building and the refurbished canteen will be rendered or painted, in keeping with the existing design of the buildings.
- 4.19 Further details of the design of the proposals are contained within the Design and Access Statement.

Industrial Provision

- 4.20 The industrial part of the scheme is located in the eastern part of the masterplan. The layout of the units has been developed to maximise floor area, whilst taking into account site constraints such as heritage issues and access, and to create, modern, purpose built industrial facilities that aim to respond positively to neighbouring uses.
- 4.21 The industrial proposals seek planning permission for 22,663 sq m of commercial floorspace within four units, with a proposed flexible use class of B1c, B2, B8 and data centre (sui generis) for unrestricted 24 hour use, 365 days a year, together with ancillary office, landscaping, access, service yards and associated car and cycle parking. The proposed new employment floorspace will provide an estimated minimum of 369 and a maximum of 536 new full-time equivalent jobs.
- 4.22 The schedule of accommodation of the industrial scheme is shown in Table 6 below.

Unit	GIA (SQM)	GEA (SQM)
1	Unit 6,916 Office 644 Plant 25 Sub-Total 7,585	Unit 7,096 Office 699 Plant 25 Sub-Total 7,585
2	Unit 1,937 Office 271 Plant 25 Sub-Total 2,233	Unit 2,011 Office 300 Plant 25 Sub-Total 7,585

3	Unit 2,762 Office 354 Plant 25 Sub-Total 3,141	Unit 2,857 Office 392 Plant 25 Sub-Total 7,585
4	Unit 7,560 Office 1,346 Plant 25 Sub-Total 8,931	Unit 7,748 Office 1,460 Plant 25 Sub-Total 7,585
Total	21,980	22,663

Table 6: Industrial Scheme Schedule of Accommodation

4.23 The industrial units seek to provide efficient workspace, with clear internal heights and associated floor loading, workable and flexible servicing areas, ancillary offices and the separation of light and heavy vehicles.

4.24 The layout of the industrial units is shown in Figure 11 below.



Figure 11: Layout of Industrial Units

Design

- 4.25 Each industrial building is located at the perimeter of the industrial part of the site, arranged around a central area that provides service yards and car parking for the units. The layout of the buildings ensures permeability through the site and provides access to the canal and proposed public realm.
- 4.26 The associated office areas have been designed to capitalise on views and add activity to areas that are within public view, such as fronting onto the canal and new public space and entrance onto the estate.
- 4.27 The buildings would rise to a maximum height of 18 metres, which allows for two storeys of office accommodation and the ability to increase the capacity of the units through the insertion of a mezzanine floor, should this be required by any future tenants. The proposals aim to provide modern industrial and distribution facilities that meet the needs of future potential occupiers.
- 4.28 The elevations of the new storage/distribution buildings are proposed to be finished with metallic cladding. In contrast the offices incorporate glazed areas to provide natural lighting. The colour palette for the scheme comprises a range of silver, white and shades of grey cladding, accented with SEGRO's red branding colours. The exception for elevational treatments is the eastern façade of Unit 4, which comprises the retained main factory building façade, which will be a rendered finish with tinted glazing in the window bays.
- 4.29 The industrial estate is in single ownership enabling a consistent approach to safety and security. The units will be designed to ensure a sense of ownership by the occupier and security will be enhanced by enclosing potentially vulnerable areas with fencing.

Supporting Uses Provision

- 4.30 A range of other commercial, retail and community uses are proposed as part of the masterplan proposals, with these uses predominately proposed within the refurbished former canteen building and the rebuilt main factory building. The majority of these uses have an intended end use, however, in order to maintain flexibility across the masterplan, a range of uses are proposed for each of the units, so that potential tenants could occupy any of the units within the scheme. The provision is summarised in Table 7 below:

Block	Unit	GEA (SQM)	GIA (SQM)	Intended Use	Flexible Uses Sought
F1	2	179	157	Business Suite (B1)	A1/A3/A4/ B1/B8/D1/D2
F4	1	40.7	33.9	Canoe Storage (B8)	
H	3	173.8	154.5	Café (A3)	
I	4/5	371.8	337.2	Management Office (B1)	
I	8/9	538.9	489.3	Office Suites (B1)	
I	6	1,000.4	959.6	Community Centre/Gym (D1/D2)	
I	7	350.4	326.9	Children’s Day Nursery/Community Facility	
I	10	330.8	301.9	Children’s Day Nursery/Community Facility	
Total		2,986	2,760		

Table 7: Schedule of Supporting Uses

4.31 The location of the supporting uses contained within the former canteen and main factory buildings are shown in the drawing below:

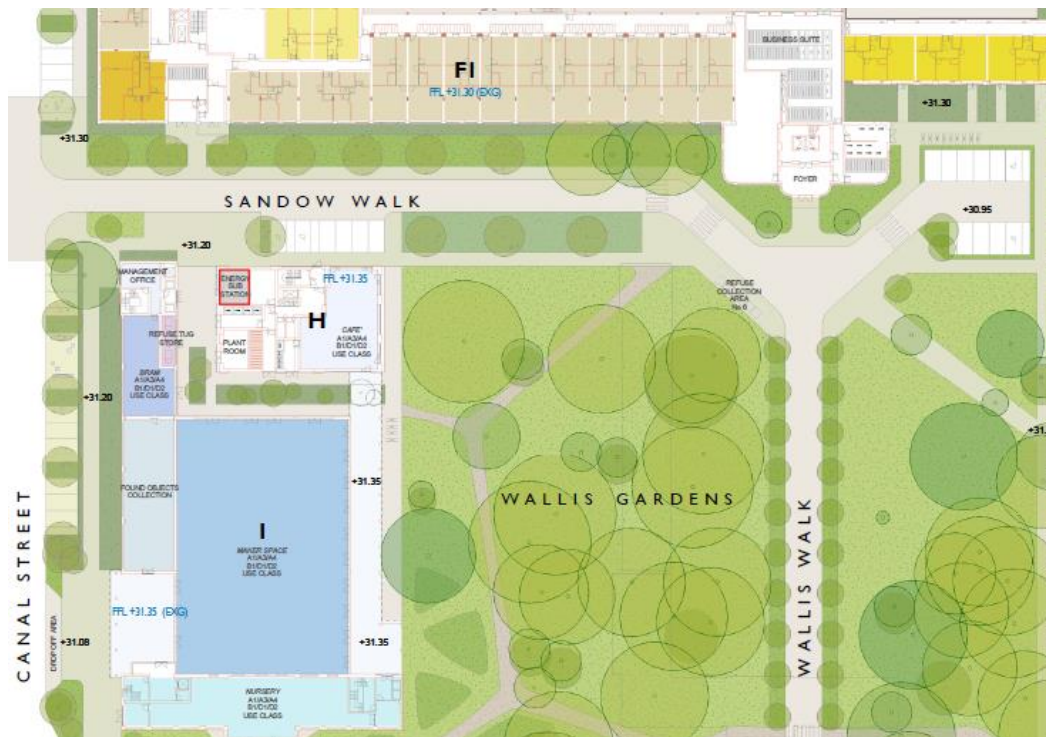


Figure 12: Location of Supporting Uses

4.32 Whilst flexibility is proposed to be maintained for all of the supporting commercial and community uses, at the time of the submission of the planning application the intended uses for the units are as follows:

- **Unit 1 – Canoe Storage:** The applicants have been in discussions with local kayaking group, The Sharks, as they have expressed an interest in acquiring storage space for kayaks adjacent to the canal.
- **Unit 2 – Business Suite:** This is located off the lobby to the entrance of the rebuilt main factory building. It is proposed to be a common area that can be used by residents for business purposes.
- **Unit 3 – Café:** This is proposed to be a café unit, selected due to its size and location amongst other non-residential uses and aspect onto Wallis Gardens.
- **Unit 4/5 – Office Suites:** This is office space that can be let to businesses at commercial rates, located on the first floor of Block I.
- **Unit 6 – Gym:** This area forms the former canteen's hall area and will provide a mix of flexible community uses and a gym.
- **Unit 7/10 – Children's Nursery/Community Facility:** A number of discussions have been held with LBH and nursery operators to seek to include a children's day nursery/community facility within the proposal. This unit is provided over two floors and benefits from access to open space.
- **Unit 8/9 – Management Office:** This is Barratt Residential Asset Management (the management arm of BL), which requires an office and storage/workshop area to manage the residential part of the scheme.

4.33 The proposed community/commercial uses are intended to support the main employment and residential uses in the scheme to create more activity and services for employees and residents.

Landscape, Public Open Space & Children's Play Space

4.34 The landscaping strategy adopted in the development of the site's masterplan is to create a series of interconnected external spaces that contribute to the setting and the uses of the proposed buildings whilst providing the community with public realm and amenity space.

4.35 Over 3 hectares of publicly accessible green and landscaped space, including 35,612 sq m of public open space, and 9,025 sq m of semi-private amenity space is proposed.

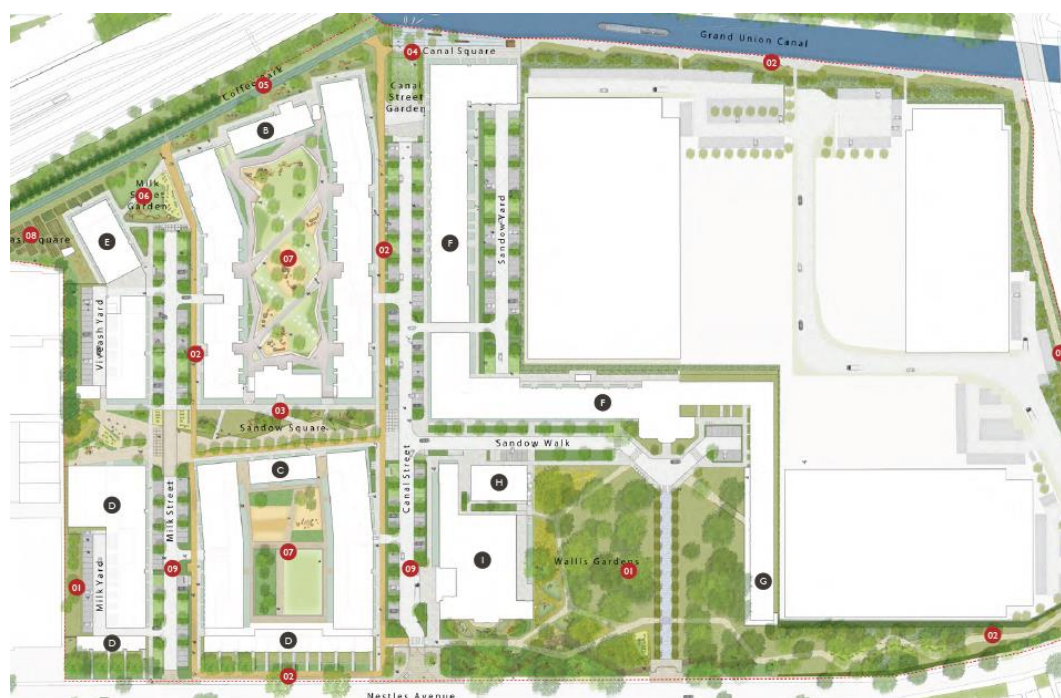


Figure 13: Landscaping Views

4.36 The key proposed landscaped areas are:

- 1) **Wallis Gardens** - The green heart of the development, a retained open space.
- 2) **Trim Trail** - The connection of the residential and industrial parts via a site-wide loop with fitness, heritage and cultural nodes along the route.
- 3) **Sandow Square** – a new central public square at the heart of the residential development.
- 4) **Canal Street garden & Canal Square** – A new public square adjacent to the canal. This area also includes land that is proposed to be safeguarded for the future potential to provide a pedestrian bridge link from the scheme, across to the north bank of the Grand Union Canal.
- 5) **Coffee Park** – Adjacent to the railway line, providing a running track.
- 6) **Milk Street Gardens** - A small pocket park.
- 7) **Podium Courtyards** - Semi-private amenity spaces, which provide the residents with doorstep amenity.
- 8) **Viveash Square** provides proposed allotments.
- 9) **Canal & Milk Street** - the main distributor routes into the development - these roads are designed to maximise any opportunity for greening.

4.37 A total of eight children's play areas are also provided within the scheme. The area provided is based on the child yield of the development and the calculations

provided in the Mayor's Play and Informal Recreation SPG. The total proposed play space is:

- Ages 0-5 1,150 sq m
- Ages 5-11 530 sq m
- Ages 12+ 310 sq m
- Total 1,990 sq m**

4.38 Further details of the landscaping proposals are provided in the Design and Access Statement submitted with the planning application.

Access, Car & Cycle Parking

Residential Scheme

4.39 Vehicular access to the residential component of the development will be from Nestles Avenue. The existing vehicular access opposite Harold Avenue will be re-opened and a new access to the west will be created. The accesses have been designed to allow the existing locally listed railings on the site's frontage to be retained.

4.40 The site will be served by two main access roads, Milk Street to the west and Canal Street to the east. These routes are 6m wide to allow access to perpendicular car parking adjacent to these streets and to provide adequate room for servicing and delivery vehicles. Connection between Milk Street and Canal Street is available for emergency services vehicles via Sandow Square. Canal Street also provides access to a route that runs in an east-west direction in front of the retained factory building façade.

4.41 Pedestrian access into the site will be available on Milk Street and Canal Street. The existing access to the east of Harold Avenue will also be re-opened for pedestrian access into the site from Nestles Avenue. This will also give public access into the existing area of open space in front of the factory building. Further pedestrian access will be available along the canal frontage to the north of the site.

4.42 Cycle access into the site will be from Nestles Avenue at Milk Street, Canal Street and the existing access to the east of Harold Avenue.

4.43 The internal layout has been designed to be permeable to pedestrians, with north-south and east-west connections provided between blocks. A central east-west route has been provided linking the open space in front of the factory building to the western site boundary. This is to enable a future east-west connection between the site and Station Road when development on the remaining sites north of Nestles Avenue comes forward.

4.44 On the canal/railway line frontage a further east-west route has been provided. This offers the potential to provide a direct link into Hayes and Harlington Station car park, subject to Network Rail's proposals for its land. Also on the canal frontage, the ability to land a disabled access compliant pedestrian/cycle bridge has been safeguarded, should future funding become available for a bridge connection across to the towpath.

Residential Car Parking

4.45 Taking account of LBH's and the London Plan's parking standards, existing parking demand for flats in the area, parking demand at other similar developments and the responses on parking provided by TfL and the GLA, a total of 712 residential parking spaces on the site, equivalent to a ratio of approximately 0.5 parking spaces per residential unit will be provided.

4.46 The initial provision on site will be broken down as follows:

- 648 standard residential spaces;
- 18 M4(3) accessible;
- 26 spaces for visiting blue badge holders; and
- 20 associated with the supporting uses.

4.47 For the private wheelchair accessible units, the requirement for an oversized parking space will depend on the occupier of the unit and their specific needs. It is therefore intended to adopt a flexible approach to enable the number of oversized spaces to be increased as and when demand for them is identified. This has been achieved by incorporating a number of areas of hard landscaping adjacent to the internal roads within the site than can be made available for parking if necessary.

4.48 The initial provision of 14 spaces for wheelchair units reflects the number of wheelchair units within the affordable component of the development. For the private wheelchair accessible units, the requirement for an oversized parking

space will depend on the occupier of the unit and their specific needs. It is therefore intended to adopt a flexible approach to enable the number of oversized spaces to be increased as necessary when demand for them is identified. This is being done by incorporating a number of areas of landscaping adjacent to the internal roads within the site than can be made available for parking if necessary.

4.49 To enable spaces to be reallocated as necessary, the lease on parking spaces will incorporate wording to allow this to take place. If the requirement for an oversized parking space arises, there is then the ability to either convert two existing standard spaces to a wheelchair accessible space and re-provide the existing spaces in the landscaped areas or to create a wheelchair space in the landscaped areas. The decision on which approach to follow will depend upon the location of the wheelchair unit within the site.

4.50 A total of 2,186 cycle parking spaces are to be provided.

Supporting Uses Car Parking

4.51 It is proposed to provide a total of 20 parking spaces for the café, gym, children's day nursery/community facility and office elements of the development. Two spaces will be allocated for staff use, a further four spaces will be designated as drop-off spaces, with duration of stay restricted to 20 minutes and the remainder will be short-stay spaces for up to two hours. 22 cycle spaces are proposed for the supporting uses.

4.52 The spaces will be managed by the on-site concierge to ensure that they are not misused.

Industrial Scheme

4.53 Vehicular access will be retained from the existing access on North Hyde Gardens consistent with the vehicular and access arrangements that applied when this Nestlé Factory was operational. The distribution of industrial traffic onto the wider highway network remains the same, however, the proposals will result in a reduced level of traffic compared to the level of traffic that could be generated by the site if the factory buildings were brought back into use.

4.54 Pedestrian access to the industrial development will be possible via a number of different routes. These include a footway leading from the existing access with

North Hyde Gardens that will be retained as part of the redevelopment of the site.

- 4.55 Additional pedestrian access into the industrial development will be possible via the residential scheme via a new footpath within the site that will lead eastwards to the entrance of the industrial site, parallel with Nestles Avenue.
- 4.56 A third point of access for pedestrians will be from a new Grand Union Canal frontage, which provides attractive car free linkage between the new residential development and the industrial element of the site.
- 4.57 The proposed level of car parking for the industrial development is as follows:
- **Unit 1** - a total of 73 spaces, 7 of which are for people with disabilities, 15 with electric charging facilities and 8 with passive provision for electric charging.
 - **Unit 2** - a total of 21 spaces, 2 of which are for people with disabilities, 4 with electric charging facilities and 2 with passive provision for electric charging.
 - **Unit 3** - a total of 31 spaces, 3 of which are for people with disabilities, 6 with electric charging facilities and 3 with passive provision for electric charging.
 - **Unit 4** - a total of 88 spaces, 9 of which are for people with disabilities, 18 with electric charging facilities and 9 with passive provision for electric charging.
- 4.58 The proposed provision is below the maximum standards identified by LBH and within the range prescribed by the London Plan for Outer London locations. Cycle access to the site will be via Nestles Avenue and North Hyde Gardens and the cycle provision will total 72 spaces, broken down as follows:
- **Unit 1**- 16 long stay spaces and 8 short stay.
 - **Unit 2** - 5 long stay spaces and 2 short stay.
 - **Unit 3** - 7 long stay spaces and 4 short stay
 - **Unit 4** - 19 long stay spaces and 9 short stay.
- 4.59 Further details of the access, servicing and car parking arrangements are provided in the accompanying Transport Assessment prepared by Markides Associates.

Demolition and Phasing

4.60 The site is large and complex with the requirement for two developers to implement their respective schemes. Due to the location of the existing buildings and the site's conservation area status, a co-ordinated approach is required in relation to the demolition of the main factory building.

Main Factory Building

4.61 The part demolition and subsequent redevelopment/retention of the Nestlé Works main factory building will be carried out within the first phase of each of the residential and industrial developments.

4.62 The boundary line between the SEGRO and BL land parcels is drawn through the middle of the factory building. The dividing line does not however align with the existing structural grid/design of the main factory building. In order to protect the structural stability of the building during demolition (and the façades to be retained) it is proposed that the SEGRO demolition works will commence first to:

- demolish the factory within the SEGRO land and partly within the BL land parcel up to the next structural gridline beyond the boundary line;
- Install temporary propping/bracing to the existing structure of the BL main factory building area adjoining the boundary; and
- Erect a hoarding along the actual boundary line between the residential and industrial areas to create a physical barrier.

4.63 Once the above works have been completed the BL demolition works to the main factory will then commence. The Proposed Development includes the retention of the following existing façades:

- Part of the eastern elevation which will be incorporated into Unit 4 of the SEGRO industrial development; and
- The southern elevation including the main factory entrance and its structure and part of the western elevation, all of which will be incorporated into Block F of the BL residential development.

4.64 The partial demolition of the main factory building will effectively be undertaken as a single sequence, although each developer will have its own demolition

contractor. Phase 1 construction of the residential and industrial developments will then commence within the construction timetable set out below.

Former Canteen

- 4.65 The locally listed canteen and wraparound building fabric and structures are to be retained. The later additions such as the colonnade, canopy and the Shower Block will be demolished. The colonnade is to be fully demolished by removing encasements, dismantling the steel frame and disconnecting it from the canteen hall structure.

Caretaker's Lodge

- 4.66 The Nestlé works lodge is to be demolished. Prior to demolition a photographic survey in accordance with Historic England's 'Understanding Historic Buildings: A Guide to Good Recording Practice' will be undertaken.

Phasing

- 4.67 Figure 14 below shows the proposed phasing of the scheme and is as follows:

- **Phase 1 Industrial** – Shown in grey;
- **Phase 1 Residential** – Shown in blue;
- **Phase 2** – Shown in green;
- **Phase 3** – Shown in yellow;
- **Phase 4** – Shown in purple;
- **Phase 5** – Shown in orange; and
- **Phase 6** – Shown in pink.

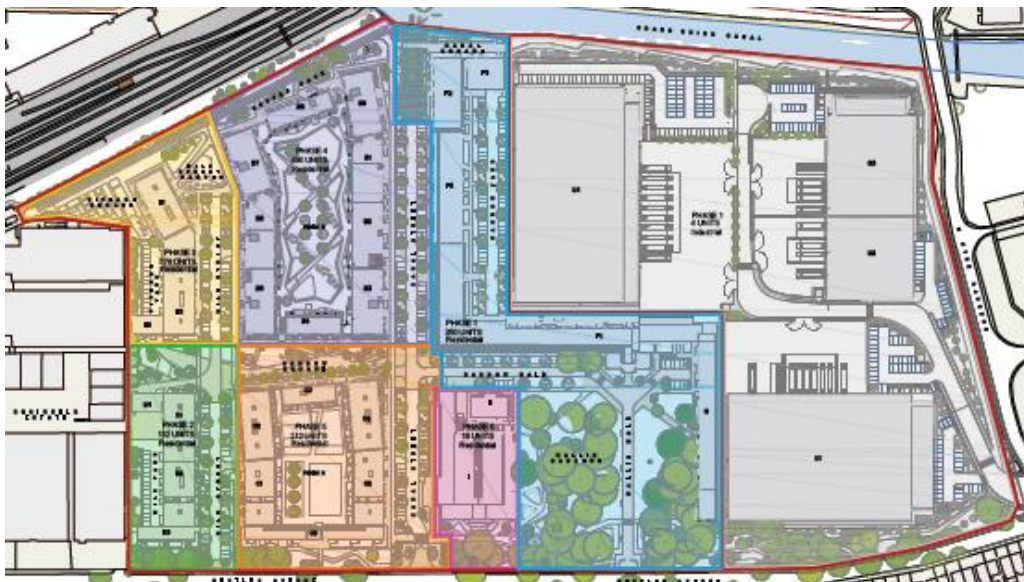


Figure 14: Proposed Phasing

4.68 Whilst Phase 1 Industrial and Phase 1 Residential will be implemented on similar timescales, they are separate phases constructed by different developers.

4.69 The industrial construction programme is as follows:

- Demolition works will commence on site upon discharge of the demolition related pre-commencement planning conditions (1st Quarter 2018), with a 6-month duration for the works on site (Completion 3rd Quarter 2018);
- Main construction works: the works will be undertaken in a single phase, commencing on completion of the demolition works and the discharge of any other pre-commencement industrial related planning conditions (3rd Quarter 2018); and
- The duration of the main construction works on site is proposed to be 8 months (Completion 1st Quarter 2019).

4.70 The residential construction programme is:

- Demolition works to commence on site once demolition related pre-commencement conditions have been discharged. This is planned as Quarter 1 2018, with a 28 week duration completing in Quarter 3 2018; and
- Construction works to commence on site once any other Phase 1 pre-commencement residential related conditions have been discharged. This is planned as Quarter 1 2018. There is a 7 year build duration to construct and complete all six residential phases with completion in Quarter 4 2024.

Summary of Proposals

4.71 The planning application seeks full planning permission for the comprehensive and sustainable redevelopment of the site, which includes a mix of residential, industrial and supporting uses. Further details of the scheme are provided in the Design and Access Statement, submitted with this planning application.

5.0 Planning Policy Context

- 5.1 This section sets out the planning policies that are relevant in considering the redevelopment of the site.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications must be determined in accordance with the relevant development plan, unless material considerations indicate otherwise. The planning application proposals will therefore need to be considered against the relevant development plan policy documents and other material considerations.
- 5.3 The planning application proposals are a departure from the development plan as the adopted Local Plan allocates the site for industrial use (further details are provided below). As a result, the Proposed Development will need to be determined against relevant material considerations, which demonstrate that planning permission should be granted.

National Planning Policy

- 5.4 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. The publication of the NPPF in March 2012 resulted in the deletion of the Planning Policy Guidance Notes and Planning Policy Statements that previously formed the National planning policy context. In addition, the Government published the national Planning Practice Guidance (PPG) on 6 March 2014 (as updated) to complement the NPPF.
- 5.5 One of the main principles running through the NPPF is the 'presumption in favour of sustainable development' (paragraph 14). This means that development proposals which accord with an up-to-date development plan should be approved by the determining authority without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 5.6 Paragraph 17 of the NPPF sets out the core planning principles, which includes:
- *"proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;*

- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- *promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas,*
- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and*
- *take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs."*

5.7 Paragraph 18 of the NPPF highlights that "the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future."

5.8 Furthermore Paragraph 19 states that "The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system."

5.9 The Government consulted on proposed amendments to the NPPF in December 2015. The key policy amendments that the Government considered are:

- Broadening the definition of affordable housing, to expand the range of low cost housing opportunities for those aspiring to own their new home;
- Increasing the density of development around commuter hubs, to make more efficient use of land in suitable locations;
- Supporting sustainable new settlements, development on brownfield land and small sites, and delivery of housing allocated in plans; and

- Supporting delivery of starter homes.

5.10 The proposed amendments to the NPPF are a material consideration in the determination of this planning application, as well as the Government's response to the proposed changes to the NPPF, as set out in the Housing White Paper, which was published on 7 February 2017. The following Government responses are particularly relevant to this planning application:

- The Housing White Paper confirms (the Government's) *"intention to strengthen planning policy to increase density in these locations (commuter hubs) as part of wider proposals to make more efficient use of land"*
- *"The Government considers that there is scope to make more effective use of land to help meet this country's housing needs"*
- *"It is reasonable to expect densities to be relatively high (such as locations that are well served by public transport)"*
- *"The Housing White Paper set out proposals to amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within existing settlements for homes."*

Statutory Development Plan

5.11 The development plan comprises:

- The London Plan (Consolidated with Alterations since 2011) (March 2016);
- The Hillingdon Local Plan: Part 1- Strategic Policies (November 2012);
and
- The extant 2007 Saved Unitary Development Plan (UDP) Policies adopted as the Hillingdon Local Plan: Part Two.

5.12 The London Plan, which forms part of the Development Plan, is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20 – 25 years.

- 5.13 In March 2015, the Mayor published the London Plan with its consolidated alterations since 2011 and in March 2016 Minor Alterations were published to bring the London Plan in line with National Housing Standards and car parking policy. The document is a material consideration in the determination of planning applications.
- 5.14 Strategic local planning policies are set out in the Hillingdon Local Plan Part 1 (LPP1) (2012), with detailed development management policies set out in the saved 2007 UDP policies and Policies Map.
- 5.15 LPP1 is a relatively recently adopted document and therefore the planning policies contained within it are relevant in the determination of planning applications.
- 5.16 Whilst the saved 2007 UDP policies comprise part of the development plan, they are outdated and therefore weight should be given to the emerging Local Plan Policies Part 2 (LPP2) (Submission Version). The LPP2 has been subject to public consultation, therefore significant weight should be given to the principle of the redevelopment of the site for a mix of uses, including residential, in the determination of development proposals.
- 5.17 A full planning policy review of the planning policies contained within the NPPF, the London Plan, LPP1 and LPP2 is provided at **Appendix 9**.

Material Considerations

- 5.18 At the time of the submission of the planning application in May 2017, there are a number of other documents that are material to the determination of the planning application:

National Documents

- National Planning Policy Framework (NPPF) (March 2012);
- National Planning Practice Guidance (2014);
- Housing White Paper, Fixing Our Broken Housing Market (February 2017);

Regional Documents

- The Mayor of London's Housing Supplementary Planning Guidance (May 2016);

- Mayor of London, A City for All Londoners (October 2016);
- The Mayor of London Housing Zones Document (March 2016);
- The Mayor of London, Heathrow Opportunity Area Planning Framework (OAPF) (September 2015);
- The Mayor of London's Draft Affordable Housing and Viability Supplementary Planning Guidance (November 2016);
- The Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (September 2012);
- The Mayor's Guidance on Preparing Energy Assessments (March 2016); and
- The Mayor's Sustainable Design and Construction SPD (April 2014).

Local Documents

- Conservation Area Designation and Locally Listed Buildings Listing;
- LBH Air Quality SPG (May 2002);
- LBH Community Safety SPG9 (July 2004);
- LBH Affordable Housing SPD (May 2006);
- LBH Live/Work SPD (May 2006);
- LBH Noise SPD (April 2006);
- LBH Accessible Hillingdon SPD (May 2013);
- LBH Land Contamination SPG (January 2014);
- LBH Planning Obligations SPD (July 2014);
- Emerging Hillingdon's Local Plan: Part 2 - Site Allocations and Designations (Submission Version) (October 2015);
- Emerging Hillingdon's Local Plan: Part 2 – Development Management Policies (Submission Version) (October 2015); and
- Emerging Hillingdon's Local Plan: Part 2 – Policies Map (Submission Version) (October 2015).

5.19 LBH is currently progressing its Local Plan Part 2, which comprises Development Management Policies, Site Allocations and Designations, and a Policies Map. Once adopted it will replace the extant 2007 Saved Unitary Development Plan (UDP) Policies adopted as the Hillingdon Local Plan: Part Two. LBH intends to submit the Plan for formal examination in summer 2017. This will enable hearing sessions to commence in autumn 2017 with formal adoption targeted in 2018.

5.20 Other Supplementary Planning Guidance/Documents and design related guidance may also be relevant and have been considered by the project

architects and consultant team. Where relevant, these have been specifically referred to in the supporting documents submitted with this planning application.

- 5.21 The comments received as part of the statutory consultation on the submitted planning application will also be a material consideration in its determination.

Site Designations

- 5.22 The site is located in Hayes, which is a key area of strategic growth and forms part of the London Plan Heathrow Opportunity Area, which covers 700 ha, with an indicative employment capacity of 12,000 new jobs and the creation of 9,000 new homes.
- 5.23 The London Plan also specifically recognises the Hayes-West Drayton corridor as being able to offer a range of redevelopment opportunities, including small business parks, logistics and mixed uses.
- 5.24 Hayes Town Centre is a designated Mayoral Housing Zone where 2,788 new homes are to be delivered (including 847 affordable), and will benefit from targeted investment in infrastructure provision and an expedited and targeted planning process.
- 5.25 The site is located within the Botwell: Nestles, Hayes Conservation Area which was first designated by the London Borough of Hillingdon on 19 June 1988 partly in response to an increased amount of demolition on the site which was considered to affect its special character. A plan of the conservation area boundary is shown in Figure 2. The boundary of the site roughly coordinates with that of the conservation area and comprises the whole of the former Nestlé factory site, north of Nestles Avenue.
- 5.26 The site is allocated under the Saved Policies of the extant 2007 UDP Proposals Map as part of a wider area designated as an Industrial and Business Area, with reference to Policy PR10 and part of the wider Nestlé Avenue industrial cluster, designated as a Strategic Industrial Location (SIL). The allocation is identified on Figure 14 below.

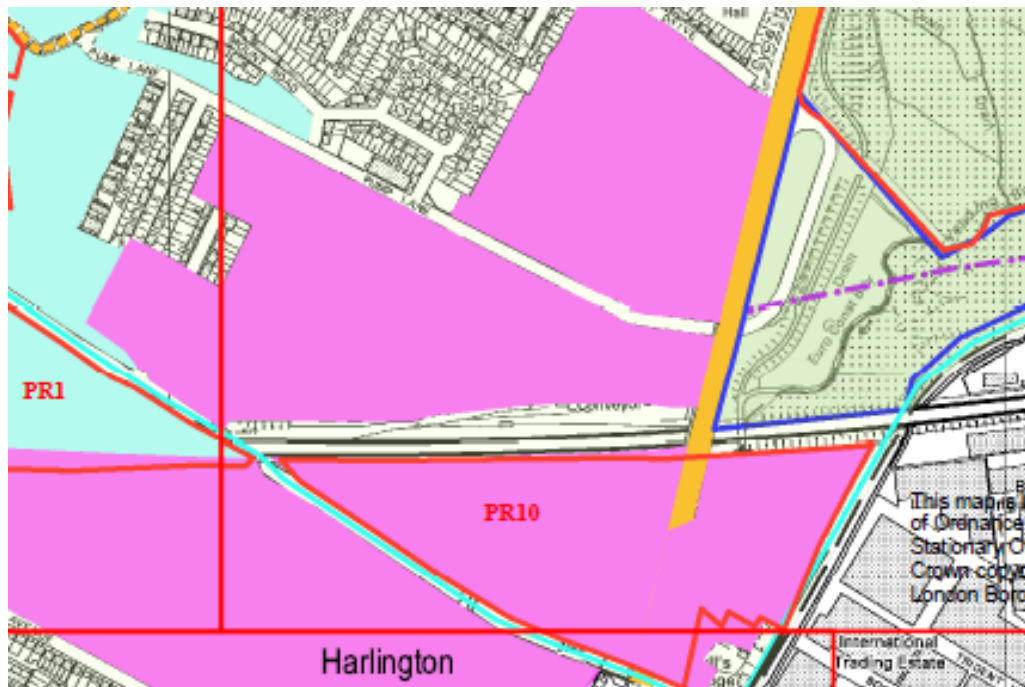


Figure 14: Saved UDP Allocation PR10, which includes the former Nestlé Factory site
KEY

Industrial and Business Areas

5.27 Policy PR10 states:

"Land at North Hyde Gardens, Hayes as identified on the proposals map should be developed for business, industrial and warehousing purposes and associated canalside activities within the Conservation Area and should take into account the following:

- (i) The need for planning comprehensive treatments of the whole site;*
- (ii) The need for improvements to the junction of North Hyde Gardens and North Hyde Road;*
- (iii) Measures to ameliorate the impact of traffic on residents;*
- (iv) Adequate access arrangements for Nestles;*
- (v) Conservation area and canalside enhancement;*
- (vi) The contribution of the proposal to the economic regeneration of Hayes"*

5.28 Whilst this site benefits from an allocation for employment uses, in LBH's review of its Local Plan Part 2 policies, the Site Allocations and Designations Document (October 2015) identifies the former Nestlé factory site as a mixed use designation under Policy SA5 – land to the South of the Railway, including

Nestlé Site, together with two adjacent sites to the west as shown on **Figure 15** below.



Figure 15: Site SA5 – Land to the South of the Railway, including Nestlé Site

5.29 Emerging Policy SA 5 notes that in 2012, Nestlé announced the planned closure of the factory. The supporting text notes that proposals will need to take account of a wide range of policy considerations, including those related to transportation, heritage and the wider objective of encouraging economic growth in Hayes town. It also recognises that the final overall quantum of uses and the number of residential units will be determined through discussions with key stakeholders and the development of a sustainable masterplan. The Policy states:

"Policy SA 5: Land to the South of the Railway, including Nestlé Site

This is an important strategic site for Hayes town and the Borough as a whole. The Council will support proposals that meet the following criteria:

Site A

- The provision of up to 500 units. Densities higher than 80 uph may be acceptable subject to high quality design. Higher density development should be located along the canal frontage.*

- *A minimum of 20 % of the site (2.4 ha) should be used for employment generating uses. Suitable uses will include B1 and elements of B2 that are compatible with the residential elements of the scheme.*
- *Small scale commercial uses to support residential uses will be considered suitable.*
- *10% of the site (1.2 hectares) should be used for open space and a sports pitch;*
- *Education facilities; and*
- *The provision of community facilities, including a public park.*
- *Proposals should include a heritage assessment which considers the retention and reuse of Locally Listed structures on this site.*
- *Proposals should include high quality design that fully integrates the Grand Union Canal, ensures canal-side improvements and maximises the canal's recreational potential.*
- *Development should contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network.*

Sites B and C

- *The provision of up to 97 residential units on Site B and 110 residential units on Site C. Proposals should be consistent with the PTAL rating and take account of lower suburban densities to the south; and*
- *A minimum of 50% of each site should contain employment generating uses including B1 office, and suitable B2 light industrial.*

As a preference Sites A, and B and C should form a comprehensive development scheme across the whole site, and which:

- *Sustains and enhances the significance of the heritage assets;*
- *Provides pedestrian links to Hayes Town Centre and key transport nodes; and*
- *Reflects the Council's latest evidence of housing need in terms of the type and tenure of residential units."*

5.30 The Proposed Development has been developed with the requirements of the emerging allocation in mind and the current application proposals largely comply with the emerging policy as discussed further in Section 6.

Relevant Planning Policies

5.31 Table 8 below provides a summary of the key national, regional and local planning policies that are relevant to the Proposed Development.

Policy Topic	NPPF (2012)	London Plan (2016)	Saved LBH UDP Policies (2007)	Local Plan Policies Part 1 (2012)	Local Plan Policies Part 2 (2015)
Presumption in favour of sustainable development	Paragraphs 7, 14 & 17	Policies 1.1, 2.6, 2.7, 2.13		Policy NPPF1	Policy SA 5 – site allocation
Housing Delivery	Paragraphs 47, 49, 50, & 51	Policies 2.6, 2.7, 3.3, 3.4, 2.8, 3.8, 3.12, 3.16	Policy H4	Policy H1	Policy SA 5 – site allocation
Affordable Housing		Policies 3.8, 3.11, 3.12 & 3.13		Strategic Objective SO7 & Policy H2	Policy DMH7
Employment	Paragraphs 19, 20 & 22	Policies 4.1, 4.4, 4.10, 4.11 & 4.12	Policy LE2	Strategic Objective SO16	Policy DME1
Supporting Uses		Policy 2.15		E5	Policy SA 5 – site allocation
Heritage	Paragraphs 126, 128, 134, 135 & 136	Policies 7.4 & 7.8	Policy BE4	Strategic Objective SO1 and Policy HE1	Policies DMHB 1, DMHB 3, DMHB 4 & DMHB 9
Transport and Parking	Paragraphs 32 & 35	Policies 2.8, 6.1, 6.3, 6.9 & 6.13	Policy AM2	Policy T1 Strategic Objective SO12	Policies DMT1, DMT 2 DMT 4, DMT 5 & DMT 6
Design & Tall Buildings	Paragraphs 17, 56, 60 & 61	Policies 3.5, 5.3, 7.1, 7.4, 7.5, 7.6 & 7.7	Policies BE14, BE19, BE20, BE21, BE22, BE23 & BE24	Policy BE1	Policies DMHB 10 & DMHB 11
Residential Quality		Policies 3.5 & 3.8	Policies BE19, BE20,		Policies DMHB11 & DMHB 16

Policy Topic	NPPF (2012)	London Plan (2016)	Saved LBH UDP Policies (2007)	Local Plan Policies Part 1 (2012)	Local Plan Policies Part 2 (2015)
			BE23 & BE24		
Residential Mix	Paragraph 9	Policies 3.8 & 3.9	Policy H4		Policy DMH2
Residential Density		Policy 3.4 and Paragraph 3.28		Paragraph 6.23	Policy DMHB 17
Daylight/Sunlight		Policy 7.6	Policy BE20		Policy DMHB 11
Energy	Paragraphs 95 – 98	Policies 5.2, 5.5, 5.6 & 5.7		Policy EM1	Policies DMEI 2 & DMEI 3
Sustainability	Paragraphs 7, 14 & 17	Policies 5.3, 5.9 & 5.17		Policy BE1	
Landscape, Amenity, Biodiversity & Blue Ribbon Network	Paragraphs 9 & 109	Policies 2.18, 3.6, 5.10, 7.4, 7.5, 7.19, 7.21, 7.24, 7.27 & 7.28	Policies BE23 & BE32	Strategic Objectives SO3 and Policy EM7	Policies DMEI 1, DMEI 8, DMHB 18 & DMHB 19
Flood Risk & Drainage	Paragraph 100	Policies 5.2, 5.12 & 5.13	Policy OE8	Policy EM6	Policy DMEI0
Air Quality	Paragraph 124	Paragraph 7.14		Strategic Objective 11 Policy EM1	Policy DMEI 14
Noise	Paragraphs 11 & 123	Policy 7.15	Policies OE1, OE3, OE5	Policy EM8	
Archaeology	Paragraph 128	Policy 7.8	Policy BE3	HE1	Policy DMHB1

Table 8: Summary of Planning Policies

5.32 An assessment of the Proposed Development is undertaken against these policies in Section 6. The planning policies identified in Table 8 above are provided in full at **Appendix 9**.

Summary

5.33 The planning policy framework identified above provides the basis to determine the Proposed Development against the statutory development plan and other material considerations.

6.0 Assessment of Relevant Planning Issues

6.1 This section sets out how the Proposed Development complies with relevant national, regional and local planning policy identified in Section 5 above.

Principle of Development

6.2 The general theme of national, regional and local planning policy is to secure sustainable development and regeneration through the efficient re-use of previously developed urban land and through concentrating development in accessible locations. This is set out in the NPPF at paragraph 14, where it states there should be a presumption in favour of sustainable development and that proposals which accord with the development plan should be approved without delay.

6.3 Further, paragraph 17 of the NPPF sets out 12 core planning principles that should underpin both plan-making and decision taking. Paragraph 17 encourages the use of brownfield land, and Paragraph 111 goes on to say that the effective use of such land should be encouraged, provided it is not of high environmental value.

6.4 The London Plan is supportive of the regeneration of brownfield sites and delivering sustainable growth across London and identifies Hayes as being located in "Outer London". Policy 2.6 sets the vision and strategy for this area stating that *"The Mayor will, and boroughs and other stakeholders should, work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches through LDFs and other development frameworks to enhance and promote its distinct existing and emerging strategic and local economic opportunities, and transport requirements."*

6.5 The site is located in Hayes, which is a key area of strategic growth and forms part of the London Plan (Policy 2.13) Heathrow Opportunity Area, which covers an area of approximately 700 ha. The opportunity area has an indicative employment capacity of 12,000 new jobs and the potential to create 9,000 new homes. The London Plan also specifically recognises the Hayes-West Drayton corridor as being able to offer a range of redevelopment opportunities, including small business parks, logistics and mixed uses.

- 6.6 The use of brownfield land is further encouraged within the London Plan, which seeks 96% of new residential development to be delivered on previously developed land in accordance with London Plan Objectives 1, 4, 5 and 6.
- 6.7 At local level, Local Plan Part 1 (LPP1) sets out a number of key strategic objectives to guide development in the Borough. These seek to deliver new housing through the creation of high quality, sustainable neighbourhoods, conserve and enhance the Borough's heritage assets, reduce reliance on car use, and address the impacts of climate change, amongst others.
- 6.8 LPP1 Policy NPPF1 states that "when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework."
- 6.9 The Local Plan Part 2 (LPP2) Site Allocations and Designations allocates the site for a mixed-use development as part of the emerging planning policy framework under site allocation SA 5 as quoted in paragraph 5.29.
- 6.10 In accordance with the policies identified above, the redevelopment of a brownfield site in an urban location is fully supported. In land use planning terms, the Proposed Development is therefore acceptable for the reasons set out below:

Opportunity Area and draft OAPF Masterplan

- 6.11 The site is allocated as part of the London Plan's Heathrow Opportunity Area where significant growth is supported, to create 9,000 new homes and employment opportunities. The application site seeks to maximise housing and jobs and therefore the proposals are compliant with the strategic aims and objectives of the London Plan.

Housing Zone

- 6.12 The acceptability of the proposals are bolstered further by the site's inclusion within the Hayes Town Centre Housing Zone, where the use of development land should be maximised for expedited housing delivery whilst also capitalising on the significant public investment in the new Crossrail system, which will further enhance the site's transport accessibility.

Local Plan Allocation

- 6.13 From a local planning policy land use perspective, the Proposed Development is not wholly in conformity with the statutory development plan as the site is allocated as an industrial and business area in Policy PR10 of the saved UDP policies, 2007 and the Proposed Development provides only part industrial use. The site is also part of the wider Nestles Avenue industrial cluster, designated as a Strategic Industrial Location (SIL).
- 6.14 Whilst the Proposed Development is a departure from the development plan, there are compelling material considerations that indicate that the development proposals are entirely appropriate in land use planning terms. These are:
1. **Conformity with Strategic Policy** – The strategic planning policy basis is such that mixed uses are considered appropriate on this site. As the London (and UK) economy continues its shift away from general industrial/manufacturing activity and evolves to focus more on the service sector, logistics and purpose built buildings across London traditional industrial/manufacturing sites that are at the end of their lifespan now offer the opportunity for redevelopment. This opportunity is captured in strategic policies set out in the London Plan, the Heathrow Opportunity area and the Hayes Town Centre Housing Zone.
 2. **Change in Local Policy** - Having undertaken a review of employment land in the Borough, LBH proposes to release 16 hectares of SIL land within the Nestles Avenue cluster (which includes the Application Site) as part of the emerging LPP2. The GLA has confirmed that it agrees with the Borough's approach to release SIL land for mixed use purposes.
 3. **Site Specific Allocation** – The emerging site allocation, Policy SA 5, contained within LPP2 "Site Allocations and Designations" document seeks to secure this shift in the land use policies affecting the application site to allow for mixed use development.
- 6.15 The SA 5 allocation therefore provides the basis for a mixed use development and should be given significant weight in the determination of the application, given that the principle of the land use allocation has been subject to public consultation through the preparation of the development plan.
- 6.16 Whilst the SA 5 allocation supports mixed use proposals, it does not, however, reflect the proposed quantum of development offered by the Proposed

Development or indeed the potential of the site having regard to its strategic location and housing zone status. As a result, representations were submitted by the applicants to the LPP2 consultation exercise. The applicants' response to the proposed SA 5 allocation is set out below (the emerging policy wording is highlighted in bold italics):

The provision of up to 500 units. Densities higher than 80 uph may be acceptable subject to high quality design. Higher density development should be located along the canal frontage.

6.17 The policy, as currently worded, states that up to 500 new residential units should be provided on site, although this quantum was proposed without the benefit of detailed design proposals being developed and without any consideration of the impending designation of the site within a Housing Zone, its sole purpose being to maximise housing delivery. The present wording of the policy would mean that where a higher number is proposed it would be contrary to policy. The increased density proposed, above the emerging policy, is therefore acceptable for the following reasons:

- (a) Officers have indication their support for the quantum of development proposed in the revised Masterplan for 1,381 dwellings, following extensive pre-application discussions on the design of the scheme and the Applicants' most recent changes to the design, made at the request of officers and comprised in this application;
- (b) the GLA as the strategic authority also fully supports the proposed number of units on the site;
- (c) the status of the application site within a Housing Zone which seeks to deliver 2,788 new homes;
- (d) the opening of Crossrail (which will further increase the PTAL rating of the residential element of the site);
- (e) the revised additional dwellings target in the London Plan identified for LB Hillingdon; and
- (f) the opportunity to maximise density through good design.

6.18 For all these reasons a significantly higher number of dwellings would be appropriate and justified.

6.19 This application demonstrates that 1,381 residential units can be accommodated successfully on the application site, whilst meeting all other policy objectives. The proposed cap on unit numbers in the policy is therefore fundamentally flawed, out of line with national and strategic policy and should be revised.

A minimum of 20 % of the site (2.4 ha) should be used for employment generating uses. Suitable uses will include B1 and elements of B2 that are compatible with the residential elements of the scheme.

6.20 The Proposed Development exceeds this requirement by providing 4.17 ha of employment land with use classes B1c/B2/B8, data centre (sui generis) and ancillary offices. As such, a significant proportion of the site can provide employment uses. The careful design process has ensured that the amenity of residential uses will not be affected by a 24 hours a day 365 days a year commercial operation.

Small scale commercial uses to support residential uses will be considered suitable.

6.21 A number of smaller scale uses to support the entire scheme and surrounding community are proposed, in a range of uses to provide flexibility to accommodate future tenants. These are described in detail in Section 4 and are considered suitable and acceptable.

10% of the site (1.2 hectares) should be used for open space and a sports pitch;

6.22 Over 3 ha of open space is provided within the scheme, including two new public parks, a running track, a trim trail, a variety of play space and the opening up of public realm to provide new access to the Grand Union Canal. This amenity provision is proposed in replacement for the requirement of a sports pitch on the site. The open space provision therefore significantly exceeds the requirements of the emerging allocation.

Education facilities

6.23 The applicants have allocated part of the refurbished former canteen building to be used as a children's day nursery/community facility which would satisfy

this emerging policy requirement. The applicants have been in discussions with LBH in relation to a suitable user. In addition, CIL will be required to be paid in relation to the scheme, which will provide a further contribution to education facilities, in line with LBH's Regulation 123 list.

The provision of community facilities, including a public park

- 6.24 A gymnasium is proposed to be provided in the main hall of the refurbished canteen building along with a children's day nursery/community facility elsewhere in the building. Wallis Gardens will provide a public park together with Sandow Square and other public realm spaces. Together, this provision would meet this emerging policy requirement.

Proposals should include a heritage assessment which considers the retention and reuse of Locally Listed structures on this site

- 6.25 A heritage assessment has been submitted (see Heritage section below and the accompanying Turleys report). The main factory building façade (along its east, southern and part of its western boundary) is to be retained, as is the canteen building and entrance gates and railings, all of which are locally listed.

Proposals should include high quality design that fully integrates the Grand Union Canal, ensures canal-side improvements and maximises the canal's recreational potential and development should contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network

- 6.26 Overall, the scheme proposes exemplar design, combining competing land uses whilst respecting the setting and the character of the conservation area. Four leading architects in their respective fields have developed a detailed proposal, which has been subject to extensive pre-application feedback, joined together by a comprehensive landscape strategy.
- 6.27 A key part of the landscaping strategy for the site is to open up recreation opportunities for the first time and secure public access to the Grand Union Canal. New public realm is proposed along the entire canal frontage, with the site providing permeable links from Nestles Avenue to the canal for pedestrians

and cyclists. It is proposed that the applicants will enter into a s106 agreement to deliver improvements to the canalside.

As a preference Sites A, and B and C should form a comprehensive development scheme across the whole site

- 6.28 The wording of the policy is clear that comprehensive development is an aspiration, not a requirement. A comprehensive development scheme has not been possible for a number of reasons, including complex land ownership issues on Site B as identified in the LPP2 emerging allocation. Land owners of Site C are promoting development schemes and BL and SEGRO have met with them on a number of occasions to share information and input into the SA 5 Masterplan, which has been led by the GLA. This wider OAPF Masterplan seeks to consider heritage assets, provide pedestrian links and meet local housing need, as required by the policy provisions. The development of the site should not be delayed due to difficulties elsewhere and indeed the very purpose of the Housing Zone designation is to enable LBH to expedite and fund housing delivery to enable Sites B and C to come forward in due course.
- 6.29 In conclusion on this section on the principle of development, whilst the Proposed Development is not entirely in conformity with the adopted local Development Plan site allocation, there are compelling material considerations which support a residential mixed use development on the application site as set out in national, strategic and emerging local planning policy and its designation within a Housing Zone.

Residential Provision

- 6.30 Paragraph 47 of the NPPF requires local planning authorities to “boost significantly” the supply of housing. Paragraph 49 of the NPPF states that: “Housing applications should be considered in the context of the presumption in favour of sustainable development.” As highlighted above, the Housing White Paper and the proposed amendments to the NPPF seek to increase the density of development on brownfield land and around commuter hubs, to make more efficient use of land.
- 6.31 Policy 3.3 of the London Plan seeks to promote increasing housing supply through intensification of brownfield land. The policy also seeks the provision of 42,000 additional homes per year across London and identifies a housing

provision target of 5,593 additional homes to be completed between 2015 and 2025 in LBH. This translates to an annual requirement of 559 dwellings per year for the Borough, although the policy also states that boroughs should seek to exceed their housing targets.

- 6.32 The site is located within the Hayes Town Centre Housing Zone and it is anticipated that with the 238 hectares allocated in the housing zone area, 2,788 new homes will be delivered, including 847 affordable dwellings. The special status of a Housing Zone is to remove all unnecessary planning restrictions combined with the funds to maximise development, and fast track homes and supporting infrastructure.
- 6.33 The GLA's Housing SPG highlights the importance of using previously developed brownfield sites for residential development, to enable boroughs to meet the housing targets set out within the London Plan. This is also reflected in the GLA's document "Homes for All Londoners", which sets out direction of travel for next review of London Plan, to focus development on brownfield sites next to transport nodes.
- 6.34 Adopted LPP1 Policy H1 states that LBH will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies. The policy sets an annual target of 425 dwellings for the 10 year period between 2011 and 2021. This is below the current London Plan annual target of 559 dwellings. In order to achieve this, the Council will promote the design and density of new homes to reflect specific land use characteristics throughout the Borough. It will ensure development makes the most efficient use of brownfield land and will promote high quality mixed use.
- 6.35 The proposals will provide 1,381 new residential units on the site which is a major contributor (almost half of the homes required in the Housing Zone) to the local housing supply and helping to meet London Plan targets and the wider strategic aims of the Hayes Town Centre Housing Zone.
- 6.36 The residential development will also deliver a number of economic benefits, which are set out in the accompanying Economic Benefits Statement, prepared by Barton Willmore. The completed residential development will deliver the following:
- Resident population generated - **2,721**
 - Of which are economically active - **1,469**

- Of which are assumed to be in employment - **1,424**
- GVA generated per annum by resident population in employment - **£95.4m**
- Annual growth in commercial expenditure - **£29.9m**
- Council Tax per annum - **£1.8m**
- New Homes Bonus - **£7.7m**

6.37 The site is in a sustainable and accessible location and is located within a designated Housing Zone, an Opportunity Area and comprises previously developed land. Therefore the proposals are in full compliance with the principles of the NPPF, London Plan Policies 3.3, LPP1 Policy H1 and LPP2 Emerging Site Allocation SA 5.

Affordable Housing

6.38 Policy 3.11 and 3.12 in the London Plan states that the maximum reasonable amount of affordable housing provision should be sought when negotiating on individual private residential and mixed use-schemes. It also states that targets should be applied flexibly, taking into account, inter alia, site costs, the availability of public subsidy and other scheme requirements.

6.39 The Mayor of London's aim is to ensure that Londoners have access to a wide choice of homes that they can afford and which meet their requirements for homes of different sizes and types (Policy 3.8). In terms of tenure split, London Plan Policy 3.11 aims for 60% of the provision to be affordable rent and 40% intermediate housing.

6.40 The Mayor of London's Draft Affordable Housing and Viability SPG (November 2016) highlights the importance of the planning system delivering more affordable housing and seeks to encourage developers towards delivering more across London, in particular at least 35% provision on a habitable room basis.

6.41 LPP1 Strategic Policy SO7 seeks to address housing need in Hillingdon using appropriate planning measures. LPP1 Policy H2 states that housing provision is expected to include a range of housing to meet the need of all types of households. LBH will seek to maximise the delivery of affordable housing from all sites. 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.

- 6.42 The policy supporting text sets an indicative target of 35% of all new units to be delivered as affordable. It also sets an indicative tenure mix of 70% social rented and 30% intermediate, but notes that housing market conditions in Hillingdon are complex and a blanket approach will not be appropriate for all areas in the borough.
- 6.43 LPP2 Emerging Policy DMH7 requires developments of 10 or more units to maximise the delivery of on-site affordable housing. Subject to viability, and if appropriate in all circumstances, a minimum of 35% of all new homes should be delivered as affordable with a tenure split of 70% social/affordable rent and 30% intermediate. The emerging policy requires affordable housing to be built to the same standards and should share the same level of amenity as private housing. Proposals that do not provide sufficient affordable housing will be resisted.
- 6.44 LBH Affordable Housing SPD (2006) provides further guidance on the delivery of affordable housing within developments (albeit this guidance is 11 years old and predates the Development Plan). The more recent LBH Planning Obligations SPD (2014) also provides guidance on affordable housing and how it should be secured. Paragraph 4.10 of the Planning Obligations SPD states that the minimum 35% level of provision of affordable housing will normally be assessed on the number of habitable rooms rather than the number of units, where this more appropriately delivers the highest acceptable proportion of affordable housing. LBH's planning application validation checklist also confirms that where the development provides 35% affordable housing by habitable room, then a financial viability assessment will not be required.
- 6.45 It is proposed that the scheme will meet emerging GLA policy and LBH policy as stated in the Planning Obligations SPD, in terms of quantum of affordable housing proposed. It is noted that there is some ambiguity on whether LBH's required provision of affordable housing is by habitable room or by unit. The offer made by the Applicants is to provide 35% affordable housing by habitable room, with the proposed tenure split in line with the Mayor's Draft Affordable Housing & Viability SPG (Route B) i.e. 30% low cost rent (London Affordable Rent), 30% intermediate product (shared ownership) and the remaining 40% also intermediate (shared ownership). It is also anticipated that 13% of 3 bedroomed family dwellings will be affordable, the majority of which will sit within the London Affordable Rent tenure.

- 6.46 The masterplan has been designed as tenure blind at the point of the submission of the planning application, so therefore the overall location of affordable housing provision has not yet been determined. Therefore all units have been designed to the same standard and levels of amenity provision.
- 6.47 In summary, the Proposed Development comprises a balanced housing tenure mix which seeks to meet local housing needs and provides an affordable element as an alternative to private market sale dwellings, whilst ensuring the financial viability and deliverability of the development, especially in the context of the other public benefits the scheme will bring, such as the retention of heritage assets and the provision of a significant amount of public open space and the CIL contribution. Given the wider benefits of the scheme and the provision of a significant contribution of new dwellings to meet both the Borough's housing targets and the requirements of the Housing Zone, the proposed affordable housing offer is considered appropriate. Further discussion with LBH will take place once the application is submitted.
- 6.48 The quantum of provision of affordable housing is compliant with emerging GLA policy and the requirements of LBH's Planning Obligations SPD.
- 6.49 Further information is provided in the accompanying Affordable Housing Statement, which has been prepared by Gerald Eve in support of the planning application proposals.

Housing Mix

- 6.50 Paragraph 9 of the NPPF states that sustainable development involves seeking positive improvements in the quality of the built environment including widening the choice of high quality homes. The NPPF recognises that to create sustainable, inclusive and diverse communities, a mix of housing based on demographic trends, market trends and the needs of different groups should be provided.
- 6.51 Policy 3.8 and 3.9 in the London Plan (2016) seeks to ensure that Londoners have access to a wide choice of homes that they can afford and which meet their requirements for homes of different sizes and types. The Mayor of London requires new developments to offer a mix of housing sizes and types.

- 6.52 The Mayor's Housing SPG (March 2016) acknowledges that local housing requirements should not be the single determinant of housing mix sought on individual developments. Boroughs should have regard to housing needs beyond their own boundaries when setting their affordable housing policies and determining planning applications.
- 6.53 The SPG highlights that: "higher density development close to public transport facilities is especially suitable for one and two person households, particularly singles, couples and sharers, students and older people. Conversely, a lower proportion of family sized homes may be appropriate in town centres, as opportunities for play and other amenity spaces tend to be more constrained in these locations. Boroughs should consider applying local policies on unit size mix flexibly for town centre and edge of centre sites where there is good accessibility, recognising the particular suitability of these locations for 1 and 2 bedroom units."
- 6.54 Saved UDP Policy H4 states that, wherever practicable, a mix of housing units of different sizes should be provided in schemes of residential development including in particular units of one or two bedrooms. Within town centres predominantly one and two bedroom development will be preferable.
- 6.55 Emerging LPP2 Policy DMH 2 (Housing Mix) requires the provision of a mix of housing units of different sizes to meet the Council's latest information on housing need and Table 4.1 of LPP2 seeks the provision of 96% 3 bed+ units within private tenure. This mix aspiration is not considered appropriate in a growth area and does not reflect local housing need or the Census data analysis where projections envisage that the general trend towards smaller households will continue, nor is it consistent with the London Plan. As set out in representations to the Local Plan (**Appendix 5**), housing mix aspirations should be applied on a site by site basis and the character and nature of the site should be taken into account.
- 6.56 The proposed mix for the scheme is 8% studio, 41% 1 bed, 41% 2 bed and 10% 3 bed. This offers a range of unit sizes that will help create a mixed community with the aim to optimise the development potential of a brownfield site within a housing zone close to a Crossrail station with accessible links into Central London.
- 6.57 Overall, the proposed mix provides a range of unit types and sizes across each tenure and is considered appropriate for the site. The variety of units will assist

in creating a mixed and balanced community and meeting identified local needs, in accordance with the objectives of the London Plan Policies 3.8 and 3.9, Saved UDP Policy H4 and LPP2 Emerging Policy DMH 2.

Density

- 6.58 As highlighted above, the Government is proposing to amend the NPPF in order to ensure that the density of development around commuter hubs makes efficient use of available land.
- 6.59 Policy 3.4 in the London Plan (2016) seeks to ensure that the housing potential of sites is optimised and states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Table 3.2 in the London Plan relates to the setting of a place and the PTAL rating. Each of these matters are addressed below.
- 6.60 The current Public Transport Accessibility Level (PTAL) varies across the site, ranging from 2 in the east and 3 in the west, however, this will rise up to a maximum of 4 and on the cusp of 5 at the western (residential) part of the site when the new Crossrail service opens at Hayes and Harlington station in May 2018. This indicates very good accessibility to public transport.
- 6.61 In accordance with the guidance provided by the London Plan (2016), the site is within an area that is considered to be "urban". The site has a PTAL rating of 2/3, therefore the density guide states that 200-450 hr/ha and between 70-170 units per hectare is appropriate.
- 6.62 The total area of the site is 12.28 ha, split between the residential area (8.11 ha) and the industrial area (4.17 ha). The residential unit density has been calculated using the residential site area and landscaped open space only and is as follows:
- Site area – 8.11 ha
 - Total number of residential units – 1,381
 - $1,381/8.11 = \underline{170 \text{ dwellings per hectare}}$

 - Total habitable rooms – 3,487
 - $3,484/8.11 = \underline{430 \text{ habitable rooms per hectare}}$

6.63 The supporting text to Policy 3.4 in the London Plan (2016) highlights that the density matrix is not a tool that should be mechanically applied. The Mayor's Housing SPG (March 2016) acknowledges that density is one aspect of a development that must be considered alongside amenity, transport, social and public transport issues, along with the ability to deliver sufficient numbers and types of homes in a high quality environment while respecting local character. Paragraph 1.3.51 specifically states that developments that are above the density ranges in Policy 3.4 should demonstrate:

- An appropriate dwelling mix;
- Exemplary design and quality;
- Good physical access to services;
- Long term management of communal areas;
- The contribution that the development makes to local 'place shaping' as well as avoiding concerns over 'place shielding' (massing, scale and character); and
- Capacity of local amenities, infrastructure and services.

6.64 The site meets the criteria in Table 3.2 of the London Plan for a PTAL of 2/3 and as such the proposed density of the site is acceptable. In any event however, the Proposed Development also meets the above requirements of design and quality to justify a density on the higher end of the density matrix.

6.65 Paragraph 6.23 of LPP1 recognises that the density of residential development should take account of the need to optimise the potential of sites compatible with local and historic context, whilst respecting the quality, character and amenity of surrounding uses.

Residential Unit Design, Amenity and Privacy

6.66 The proposed residential units have been designed to be of the highest quality and to comply with (and where possible to exceed) the National Technical Standards and the Mayor of London's Housing Design Standards.

6.67 The internal layouts of the dwellings have been designed to provide living spaces that maximise views, ventilation and access to daylight and sunlight. Each dwelling is provided with private amenity space, either as a balcony, a terrace or internalised amenity space.

- 6.68 The dwelling provision has also been designed to address accessibility. All dwellings will meet Building Regulations Part M. This will include units across all tenures.
- 6.69 For specific details on how dwellings comply with the National Technical Standards and the Mayor of London's Housing Design Standards, see the Housing Statement, which is part of the Design and Access Statement, submitted in support of the planning application.

Daylight and Sunlight

- 6.70 Guidelines relating to daylight and sunlight are contained within the Building Research Establishment (BRE) Handbook – Site Layout Planning for Daylight and Sunlight (1991). This guidance includes discussion on how to protect the daylighting and sunlighting of existing buildings when new developments are proposed.
- 6.71 Policy 7.6 of the London Plan requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing. The policy makes reference to this being particularly important for residential buildings.
- 6.72 Saved UDP Policy BE20 requires buildings to be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded. LPP2 Emerging Policy DMHB 11 (Design of New Development) states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 6.73 A full assessment of the daylight and sunlight impacts of the Proposed Development has been undertaken by Point 2 Surveyors and is submitted in support of this planning application.
- 6.74 The report concludes that following a detailed technical assessment, the Proposed Development will have no noticeable effect upon the daylight and sunlight amenity currently enjoyed by the existing residential properties. In terms of the proposed residential accommodation, a representative selection of 1,800 habitable rooms across the Proposed Development has been undertaken, with 80% achieving the recommended ADF targets and 75% of rooms receiving

daylight penetration to over 80% of the working plane, which demonstrates a very good rate of compliance for an urban high-density development.

- 6.75 The report considers internal sunlight availability and states that a pragmatic approach to the BRE guidance should be adopted given that there is the need to provide valuable private amenity space in the form of balconies, which naturally limit the access to sunlight to those rooms beneath them. Even with this factored in, over 60% of the habitable rooms tested, regardless of orientation, will have access to over 15% APSH annually, which is a good level of sunlight for an urban development. A sun on ground assessment has also been undertaken to consider the extent of any potential overshadowing on open amenity spaces and finds that 17 out of 19 amenity areas satisfy the assessment criteria.

Employment Provision

- 6.76 At the heart of the Government's planning policy is a remit to support economic growth, paragraph 19 of the NPPF is committed to ensure that the planning system does everything it can to support sustainable economic growth. Paragraph 20 requires that local planning authorities should plan proactively to meet the development needs of business.
- 6.77 In relation to 'Outer London' Boroughs (i.e. such as Hayes) the Mayor will aim to "support and promote Outer London as an attractive location giving access to the highly-skilled London workforce, relatively affordable work space and the competitive advantages of the wider London economy."
- 6.78 Policy 2.7 looks specifically at the economy in Outer London, highlighting that the Mayor will seek to address constraints and opportunities in the economic growth of Outer London so that it can rise above its long term economic trends including "enabling existing sources of growth to perform more effectively, and increasing the competitive attractiveness of Outer London for new sectors or those with the potential for step changes in output."
- 6.79 Policy 4.1 refers to developing London's economy, stating "the Mayor will work with partners to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger

employers and small and medium sized enterprises, including the voluntary and community sectors.”

- 6.80 Policy 4.4 refers to industrial land and premises, stating that the Mayor will work with Boroughs and other partners to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London.
- 6.81 Strategic Objective 16 of LPP1 states that LBH will manage appropriate growth, viability and regeneration of town centres. Policy DME 1 supports employment uses on designated employment sites and states that the Council will support industrial and warehousing uses (use classes B1(c), B2 and B8) and sui generis uses that are appropriate in an industrial area.
- 6.82 The industrial part of the proposals lies to the east of the site and will provide 4 industrial units with a total of 22,663 sq m for Class B1(c), B2, B8 and data centre (sui generis) uses. The uses proposed will allow flexibility for future tenants to occupy the units to meet varying business needs
- 6.83 The proposals will create employment opportunities across a range of occupations and skill levels. It is anticipated that the new employment floorspace will provide an estimated minimum of 369 and a maximum of 536 new full time equivalent jobs.
- 6.84 An Economic Benefits Statement, prepared by Barton Willmore, has been submitted in support of the planning application that assesses the anticipated job creation of the industrial scheme and the scheme as a whole during the construction phase. The Statement also sets out the likely income the scheme will generate through expenditure by residents and employees, council tax receipts, business rates revenue and the new homes bonus.
- 6.85 In summary, the Economic Benefits Statement concludes that the scheme will deliver the following benefits:

Construction Phase

- Construction Jobs generated - **357**
- Indirect construction jobs - **250**
- Construction GVA - **£211.3m**

Completed Industrial Development

- Net direct/indirect employment creation – **369-536 Full-Time Equivalent Jobs**
- GVA generated per annum from employment uses - **£24.7m - £35.9m**
- Business Rates - **£1.3m**

6.86 The Proposed Development are located in an area where employment uses are supported by strategic and local planning policy and therefore the industrial proposals are in conformity with the development plan. The site is allocated in the adopted 2007 UDP as an industrial and business area, where business, industrial and warehousing uses are supported. These uses are also supported in the emerging site allocation SA 5, which requires that 2.4ha of the site should be used for employment generating uses, which the Proposed Development far exceeds, delivering 4.17ha of industrial area.

Supporting Uses

- 6.87 The Proposed Development includes 2,986 sq m (GEA) of supporting industrial and community floorspace, with the following flexible uses applied for – A1 (retail)/A3 (food and drink)/A4 (drinking establishments)/B1 (business)/B8 (storage)/D1 (non-residential institutions) and D2 (assembly & leisure).
- 6.88 The site is not located within an identified retail centre so therefore the proposed industrial space is likely to comprise a local shop or community use.
- 6.89 London Plan Policy 2.15 seeks for town centres to be the focus for development and intensification. Development proposals should sustain and enhance the vitality of town centres and support and enhance their competitiveness, quality and diversity.
- 6.90 LPP1 Policy E5 seeks to accommodate retail growth in established town centres and is supported by LPP2 Emerging Policy DMTC 1.
- 6.91 Emerging Site Allocation SA 5 states that small-scale commercial uses to support residential uses will be considered suitable.
- 6.92 Having regard to the overall context of floorspace proposed, the amount of supporting use floorspace is considered appropriate. The mix of uses sought aims to create a balanced and sustainable community to support the residential

element of the development, with only a small proportion of floorspace given to town centre uses. For example, whilst a flexible permission is sought across all of the supporting use units to include Use Class A1 retail, it is not the intention for all of that floorspace to be given to that use. The uses applied for are intended to be flexibly applied.

- 6.93 The Proposed Development comprises an appropriate commercial/community provision on the site, given its location, and will help to achieve a vibrant community, adding to the vitality and viability of the area and wider town centre location. The Proposed Development is therefore in accordance with national, regional and local policy and the emerging site allocation.

Open Space, Children's Play Space and Trees

- 6.94 Paragraph 9 of the NPPF seeks positive improvements in the quality of the built, natural and historic environment and paragraph 109 further endorses this by stating that the planning system should contribute to and enhance the natural and local environment.
- 6.95 Policy 2.18 of the London Plan seeks to protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure.
- 6.96 Policy 3.6 seeks to ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible.
- 6.97 Policy 5.10 supports urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.
- 6.98 Paragraph 7.24 of the London Plan supports the Blue Ribbon Network, which is a strategically important series of linked spaces seeking to contribute to the overall quality and sustainability of London by prioritising uses of the water space and land alongside it safely for water related purposes.

- 6.99 Policy DMEI 8 of the LPP2 requires that all development alongside frontage to the Grand Union Canal will be expected to contribute to biodiversity improvements of the canal.
- 6.100 The landscaping strategy adopted in the development of the site's Masterplan, is to create a series of interconnected external spaces that contribute to the setting and the uses of the proposed buildings, whilst providing the community with high quality public realm and amenity space. The development opens up accessibility to the canal, which is consistent with the aims of the Blue Ribbon Network.
- 6.101 Over 3 hectares of publicly accessible green and landscaped space, including 35,612 sq m of public open space, and 9,025 sq m of semi-private amenity space are proposed, which is significantly more than the amount required by the emerging site allocation SA 5 (1.2 hectares or 10% of the site).
- 6.102 The amenity provision is of high quality, developed as an integral part of the masterplan and seeks to provide varying amenity areas to members of the public. The site has always been in private use and access to the open spaces and to the canal side will be provided for the first time in the site's history.

Children's Play Space

- 6.103 The Proposed Development provides opportunities for play and is considered to conform with the Development Plan and the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG. The amount of play space has been calculated in line with the child yield calculator in the SPG. Overall, the total proposed play space proposed is below, which is compliant with the SPG:

- Ages 0-5 1,150 sq m
- Ages 5-11 530 sq m
- Ages 12+ 310 sq m
- Total 1,990 sq m**

- 6.104 Natural play features have been integrated into the design thereby encouraging imaginative and diverse play for younger children. The overall provision and distribution of the playspace is shown within the submitted Design and Access Statement.

Trees

- 6.105 Tree surveys have been undertaken for both the residential and industrial parts of the proposals, together with arboricultural impact assessments.
- 6.106 Pursuant to LBH's policy requirements and in line with current best practice, a survey and assessment has been prepared to inform the retention of trees of merit, and their contribution to amenity, where appropriate and practicable.
- 6.107 The Proposed Development will retain the high quality tree cover, and the majority of the moderate quality trees considered to be important to the future amenity of the site and in facilitating the Proposed Development integration within the wider setting.
- 6.108 The level of the proposed tree retention is considered practicable, subject to future detailed design reflecting the need for temporary protection, and mitigation for permanent development in close proximity to retained trees during construction.
- 6.109 It is considered that the tree strategy will ensure the long-term viability of retained trees and an appropriate tree cover, and would not result in harm to the retained trees or over-compromise the wider treescape. The principle of the Proposed Development is therefore considered supportable from an arboricultural perspective and in terms of the Local Policy where it relates to trees. Appropriate mitigation planting proposals, and the adoption of future safeguards for protecting trees during construction, can be achieved by the imposition of suitable planning conditions.
- 6.110 A detailed Arboricultural Method Statement will be prepared which expands on Appendix D of the Arboricultural Impact Assessment, and will be secured by condition.
- 6.111 The Arboricultural Method Statement could include: specifications for tree protection barriers, including any revisions to barrier locations; a schedule of tree works; phasing of work; safeguarding procedures for development within RPAs, and a scheme for auditing tree protection and subsequent reporting to LBH's arboricultural officer should feature explicitly throughout.
- 6.112 Given the amount of public realm and playspace provided, the opening up of access to the canal and the mitigation measure proposed to protect trees, the

Proposed Development meets the requirements of the Planning Policy Framework.

Heritage

- 6.113 The masterplan proposals have been designed to enhance the on-site heritage assets, including the conservation area, in accordance with the provisions of national, regional and local planning policy.
- 6.114 The NPPF requires proposals to conserve heritage assets in a manner appropriate to their significance. Paragraph 128 requires applicants to describe the significance of any heritage assets affected by Proposed Development. Paragraph 132 states that heritage assets should be conserved and that the more important the asset, the greater the weight that should be given to its conservation.
- 6.115 Paragraph 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 6.116 Paragraph 135 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.117 Paragraph 136 of the NPPF sets out that local planning authorities should look for opportunities for new development within the setting of heritage assets, which would enhance or better reveal their significance. It advises that such development proposals should be treated favourably.
- 6.118 Policy 7.4 of the London Plan seeks that buildings, streets and open spaces should provide a high quality design response that is informed by the surrounding historic environment.
- 6.119 Policy 7.8 of the London Plan requires developments to identify, value, conserve, restore, reuse and incorporate heritage assets where appropriate. Developments affecting heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Applicants

are required to describe the significance of any heritage asset affected by proposed developments, including any contribution made to their setting.

- 6.120 LPP1 Strategic Objective SO1 seeks to conserve and enhance the borough's heritage and its setting by ensuring that new developments are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of heritage to London's environmental quality.
- 6.121 LPP1 Policy HE1 (Heritage) states that LBH will conserve and enhance Hillingdon's environment, settings, and wider historic landscape. This includes the Grand Union Canal, designated heritage assets, and locally recognised heritage features including locally listed buildings. LBH will actively encourage the regeneration of heritage assets and seek to promote increased public awareness, understanding of, and access to the Borough's heritage assets. The policy encourages the reuse and modification of heritage assets where appropriate.
- 6.122 Saved UDP Policy BE4 (Conservation Areas) states that new development will be expected to preserve or enhance those features, which contribute to their special architectural quality and that there will be a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area.
- 6.123 Emerging Policy DMHB 1 states that development that has an effect on heritage assets will only be supported where; it sustains and enhances the significance of the heritage asset and puts them into viable use consistent with their conservation; it will not lead to substantial harm or total loss of significance without providing substantial public benefit that outweighs the harm or loss; and makes a positive contribution to the local character and distinctiveness of the area.
- 6.124 Emerging Policy DMHB 3 states that there is a general presumption in favour of the retention of buildings and the LBH will take into account the effect of a proposal on the building's significance and the scale of any harm or loss.
- 6.125 Emerging Policy DMHB 4 states that new development in conservation areas will be expected to preserve or enhance the character or appearance of the area.
- 6.126 Policy DMHB 9 requires that war memorials should be protected and there is a general presumption in favour of their retention in situ.

- 6.127 The heritage assets that will be affected either directly and/or indirectly by the Proposed Development have been identified and their significance has been assessed within the Heritage Assessment prepared by Turleys.
- 6.128 The application site is situated within the Botwell: Nestles, Hayes Conservation Area, a designated heritage asset as set out in the NPPF.
- 6.129 Four buildings/structures within the application site have also been identified as having architectural and historic interest and, as such, are locally listed by LBH but which are not designated heritage assets under the NPPF. These include the Nestlé Works (Main Factory Building); the Nestlé Works (Former Canteen); the Nestlé Works (Gates and Railings); and the Nestlé Works (Lodge), which are shown in Figure 3 in Section 2.
- 6.130 The Application Site comprises the whole of the conservation area, which has been included in the Historic England 'Heritage at Risk Register'. A key element of the conservation area's special interest, and hence its designation, is derived from its history of continued use as a chocolate and coffee making factory, save for a short recess during the First World War (when it was requisitioned for use as a munitions factory). The site remained in operation until 2012, although some manufacturing processes were undertaken until 2014, and decommissioning took place through into 2015.
- 6.131 This cessation of the historic use of the site has had a fundamental and harmful effect on the character and appearance of the conservation area, in part resulting in its 'at risk' status. The Proposed Development of the site now presents an important opportunity to:
- significantly improve the present derelict and abandoned character and appearance of the conservation area;
 - restore some industrial use-character; and
 - remedy past damage caused by piecemeal additions and buildings, which have masked other elements of interest.
- 6.132 Considerable time and thought has been given to the form of development within the conservation area and the retention of those locally listed elements which form the heart of the conservation area and make a positive contribution to it.
- 6.133 For reasons explained in the heritage statement, it is proposed to retain the north, east and part of the western façades of the Main Factory building

including the entrance tower, the canteen building and the gates/railings. The former lodge building will be demolished. New built form and public realm will be introduced within a high quality design, which retains the industrial character of the conservation area and responds to the distinctive characteristics of its changing contexts.

6.134 The proposals have been significantly informed by pre-application engagement with Historic England and the GLA has confirmed that the development would enhance the character and appearance of the conservation area.

6.135 A number of heritage benefits will stem from the proposed development as summarised below which will have a positive effect on the conservation area and those locally listed buildings to be retained:

- The introduction of a viable mixed use to the site, which enables the retention of those elements which make the greatest contribution to the significance of the conservation area and its industrial character;
- Removal of later accretions and buildings, which have been introduced on an ad hoc basis, and their replacement with high quality built form in keeping with the historic industrial character of the site;
- Rebuilding of the 11 bay façade of the Sandow building as a scholarly replica due to the heavily compromised condition of the surviving elements of the building. This will better reveal the historic interest of the locally listed Nestlé Works (Main Factory Building) and the conservation area;
- Maintain and enhance the garden (to be named Wallis Gardens) area and its interconnection with the surrounding historic built form through re-landscaping and the introduction of additional trees;
- The repair of the mid-20th century (art deco inspired) entrance hall and staircase of the Nestlé Works (Main Factory Building) as a local landmark feature of the conservation area;
- The relocation of the Nestlé World War 2 memorial back onto the site;
- Removal and replacement of the windows of the retained façades of the Nestlé Works (Main Factory Building), which represent a variety of glazing patterns, and replacement with a unified design, closely resembling the original appearance;
- The removal of the modern canopy over the locally listed Nestlé Works (Former Canteen) and making good of uncovered original fabric;
- Reinstatement of the original detailing of the south façade of the Nestlé Works (Former Canteen), removing later accretions;

- Repair of the Nestlé Works (Gates and Railings) and reinstatement of their original purpose, providing attractive entrances to Canal Street and Wallis Gardens as the historic entrances to the site;
- Introduction of new public green spaces to maintain and enhance the original intentions of the factory in a garden ethos;
- Re-connection of the conservation area with its canal side setting through the removal of the existing fencing and the introduction of new high quality built form and public realm, including a pathway connecting a series of squares and gardens; and
- The potential removal of the Botwell: Nestles, Hayes Conservation Area from the Historic England Heritage at Risk Register.

6.136 In overall terms, as concluded in the Turleys Heritage Assessment, the Proposed Development will preserve or enhance the character or appearance of the Botwell: Nestles, Hayes Conservation Area and those elements which contribute to its significance. Those elements of local architectural and historic interest of the Nestlé Works (Main Factory Building), Nestlé Works (Former Canteen) and the Nestlé Works (Gates and Railings) will also be retained, conserved, and enhanced, through the removal of modern piecemeal structures and buildings and replacement with high quality new built form. The retention of these structures will preserve the character and enhance the appearance of the conservation area.

6.137 The locally listed Nestlé Works (Lodge) will be demolished as part of the Proposed Development, resulting in the total loss of the building's local significance. However due to its limited contribution to the significance of the conservation area, it is not considered that this would result in harm to the conservation area, and the loss of significance would be outweighed by the substantial number of public (including heritage) benefits that will stem from the development. This is consistent with the aims and objectives of paragraphs 134 and 135 of the NPPF.

6.138 On balance of all considerations, the Proposed Development would therefore accord with the relevant statutory duty of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy contained within the NPPF and supported by the NPPG, and other relevant regional and local policy and guidance.

Transport and Car Parking

- 6.139 In accordance with the NPPF, all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. At the regional level Policy 6.3 of the London Plan requires the assessment of the effects of transport and seeks to ensure that development considers the impact on transport capacity and the transport network and does not adversely affect the safety of road users and pedestrians.
- 6.140 London Plan Policy 6.1 encourages development which reduces the need to travel by car and supports development at locations with high public transport accessibility. The Mayor's overall strategic vision is to encourage development to reduce car borne travel.
- 6.141 LPP1 strategic objective SO12 promotes the reduction of reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans.
- 6.142 LPP1 Policy T1 states that LBH will steer development to the most appropriate location in order to reduce its impact on the transport network and all development should encourage access by sustainable modes including walking and cycling. This is further supported by Saved UDP Policy AM2.
- 6.143 Policy DMT 1 of the emerging LPP2 states developments proposals will be required to undertake a TA and Travel Plan if they meet or exceed the thresholds of 80 units for C3 residential developments. DMT 1 also states that in order for developments to be acceptable they are required to:
- Be accessible by public transport, walking and cycling and the services and facilities necessary to support the development;
 - Maximise safe, convenient and inclusive accessibility to, and from developments for pedestrians, cyclists and public transport users;
 - Provide equal access for all people, including inclusive access for disabled people;
 - Adequately address delivery and servicing requirements; and
 - Have no significant transport or associated air quality and noise impacts on the local and wider environment and strategic road network.

- 6.144 Policy DMT 2 requires development proposals to ensure that safe and efficient vehicular access to the highway network is provided to the Council's standards, and they do not contribute to the deterioration of air quality and noise. This policy also requires safe, secure and convenient access and facilities for cyclists and pedestrians.
- 6.145 Policy DMT 4 states that LBH may require development to mitigate transport impacts from development proposals by improving local public transport facilities and services.
- 6.146 Policy DMT 5 requires development proposals to ensure that safe and direct access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:
- The retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;
 - The provision of a high quality and safe public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;
 - The provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and
 - The provision of cycle parking and changing facilities in accordance with the maximum C3 flat standards of 1 cycle parking space per 1 or 2 bedroom unit and 2 spaces per 3 or more bedroom unit.
- 6.147 A Transport Assessment prepared by Markides Associates is submitted with the planning application. The assessment notes that the site benefits from being highly accessible by sustainable modes of transport. Hayes town centre is less than 1km away and there are a range of retail, employment, education, health and leisure uses within walking and cycling distance of the site. Pedestrian and cycle audits of the area around the site show that existing infrastructure is generally of good quality, with very few areas that would benefit from improvements.

Highways Impact

- 6.148 With regard to the road network, the site is bounded to the south by Nestles Avenue and to the east by North Hyde Gardens. There is no vehicular connection between these two roads as there is a closure at the western end of Nestles Avenue that allows access by pedestrians and cyclists only. At the eastern end of Nestles Avenue is Station Road, which forms a north / south route from Hayes

town centre through Harlington to the A41 north of Heathrow. To the south of and parallel with Nestles Avenue is North Hyde Road. This connects to Station Road to the west of the site at a signal controlled junction. To the east of the site it gives access to North Hyde Gardens and the Bulls Bridge Roundabout, where the A312 Parkway provides access to the M3 J3 to the south and the A4020 and A40 to the north. The A312 and Bulls Bridge Roundabout form part of TfL's road network, whilst North Hyde Road and Station Road are the responsibility of LBH.

6.149 Junction capacity assessments have identified that both the Bulls Bridge Roundabout and M4 J3 have capacity problems under current traffic conditions. In addition, on the LBH road network, the junctions of Dawley Road / Botwell Common Road, Botwell Lane / Printinghouse Lane and Botwell Lane / Church Road were found to have capacity problems.

6.150 In terms of the proposed scheme, the employment development will be accessed from North Hyde Gardens, utilising the same access as the existing Nestlé Factory, whilst the residential element of the development will be accessed from Nestles Avenue. No HGV traffic will therefore use Nestles Avenue,

Mitigation Measures

6.151 For the LBH network, the following junctions are identified to be adversely impacted by the development proposals to the extent that improvements are justified:

- Dawley Road / Botwell Common Road Priority Junction;
- Dawley Road / Kestrel Way / Betam Road / Blyth Road Roundabout;
- Harold Avenue / North Hyde Road Priority Junction; and
- Station Road / North Hyde Road Signals.

6.152 For the first two of these junctions, improvements consisting of localised widening have been identified to mitigate the development impact. At the Harold Avenue / North Hyde Road junction, the introduction of a right turn refuge in the centre of North Hyde Road is proposed to mitigate development traffic impact. Finally, at the Station Road / North Hyde Road signals changes to the signal staging are identified to improve the junction performance.

6.153 Assessments including the cumulative effects of development north of Nestles Avenue identify that the proposed mitigation at the first two junctions is sufficient to mitigate the impact of development at the former Nestlé site.

- 6.154 Further improvement may be required at the Harold Avenue / North Hyde Road and Station Road / North Hyde Road junctions to mitigate the cumulative effects of all of the sites north of Nestles Avenue.
- 6.155 As well as junction improvements, there are a number of other measures that will be funded by the development to ensure car ownership at the site is as low as possible and to encourage the use of sustainable modes of transport. These include:
- Funding for the provision of a Controlled Parking Zone on the road network adjacent to the site;
 - The introduction of a residential Travel Plan for the residential development and an industrial Travel Plan for the industrial development to encourage the use of sustainable modes of transport; and
 - Funding for the provision of 5 car club vehicles and free membership for one member of each household on the development for three years.

Car Parking

- 6.156 Car and cycle parking provision for the employment uses is in line with the London Plan for non-B1 employment uses. The residential scheme has cycle parking provided in line with the London Plan standards. Car parking for the residential scheme is proposed to be provided at an average of 0.5 spaces per unit. This complies with the London Plan requirements for substantially less than 1 space per unit in locations with good public transport accessibility. Further justification for the level of proposed car parking is provided in the submitted Transport Assessment.
- 6.157 The proposed level of parking provision is considered to be appropriate for the site when considering its location, PTAL rating and the arrival of Crossrail in May 2018.
- 6.158 The current PTAL varies across the site, ranging from 2 in the east and 3 in the west, however, this will rise up to a maximum of 4 and on the cusp of 5 at the western (residential) part of the site when the new Crossrail service opens at Hayes and Harlington station. This indicates very good accessibility to public transport. The site is 500 m from Hayes and Harlington station which provides services to central London.

6.159 As the arrival of Crossrail will deliver major improvements to the station and rail services, it is considered that a high proportion of future residents will commute to central London for work via Hayes and Harlington station. This provides further justification for the relatively lower level of parking provision on site.

Travel Plans

6.160 A draft Industrial Framework Travel Plan has been submitted for the industrial development and a draft Travel Plan has been submitted for the residential development. These set out a range of preliminary management strategies to support and encourage sustainable travel. The residential Travel Plan will seek to ensure residents have up to date travel information in order to encourage the use of sustainable travel modes. The Travel Plans will be secured via the Section 106 Agreement.

6.161 An Industrial Framework Travel Plan has been provided for the industrial development as future occupiers will set specific detailed Travel Plans for the requirements of each company.

6.162 In terms of policy compliance, the accompanying Transport Assessment demonstrates the site is accessible to a range of social infrastructure and benefits from being located within close proximity to a range of public transport infrastructure, ensuring residents are not reliant on travel by private car.

6.163 This level of accessibility supports the proposed strategy for limited car parking provision. Disabled car parking provision will also be made that ensures each wheelchair accessible unit has a parking space available at first occupation. Should additional accessible car parking spaces be required, this can be increased by providing additional spaces in the masterplan.

6.164 The requirement for an oversized parking space will depend on the occupier of the unit and their specific needs. It is therefore intended to adopt a flexible approach to enable the number of oversized spaces to be increased as necessary when demand for them is identified. This is being done by incorporating a number of areas of landscaping adjacent to the internal roads within the site than can be made available for parking if necessary.

6.165 To enable spaces to be reallocated as necessary, the lease on parking spaces will incorporate wording to allow this to take place. If the requirement for an oversized parking space arises, there is then the ability to either convert two existing standard spaces to a wheelchair accessible space and re-provide the

existing spaces in the landscaped areas or to create a wheelchair space in the landscaped areas. The decision on which approach to follow will depend upon the location of the wheelchair unit within the site.

6.166 In line with the requirements of the NPPF:

- Opportunities for sustainable transport modes have been taken up to reduce the need for major transport infrastructure;
- Safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken that cost effectively reduce the impact of the development and ensure that it does not have a severe residual impact.

6.167 In terms of walking, cycling, public transport and vehicular modes of transport, and with the site specific mitigation measures provided above, the development is in accordance with the development plan in transport terms. Further details are contained in the Design and Access Statement and Transport Assessment.

Townscape and Visual Impact

6.168 A Townscape and Visual Impact Assessment (TVIA) has been undertaken for the Proposed Development and is submitted with the planning application.

6.169 Paragraph 56 of the NPPF notes that the Government attaches great importance to the design of the built environment. Paragraph 61 notes that although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations.

6.170 National Planning Practice Guidance (PPG) supports the use of landscape character assessments as a tool for understanding character and local distinctiveness of the landscape and identifying the features that give it a sense of place, as a means to informing, planning and managing change. Under the heading of Design, sub-heading 'The importance of good design', Paragraph 001, the PPG notes that good quality design is integral to sustainable development and that decision makers should always seek to secure high quality design. The PPG also notes that good design responds in a practical and creative way to the function and identity of a place whilst ensuring that spaces work well for everyone and that they will be able to adapt to the needs of future generations.

- 6.171 Policy 7.1 of the London Plan provides the overarching framework to place shaping and 'lifetime neighbourhoods'. In order to achieve neighbourhoods of a good quality and environment fostering active local communities, Policy 7.1D seeks that: "The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood."
- 6.172 Policy 7.4 of the London Plan states: "Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character of the future function of the area..."
- 6.173 Policy 7.7 states that tall buildings should be generally limited to sites in the Central Activities Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. They should relate well to the form, proportion and scale of surrounding buildings and make a significant contribution to local regeneration.
- 6.174 LBH's LPP1 sets out strategic policies for development in the Borough. The supporting text of Policy H1 states "High quality design for new homes will continue to be a priority for the Council...The density of residential development should take account of the need to optimise the potential of sites compatible with local and historic context, while respecting the quality, character and amenity of surrounding uses".
- 6.175 With regards to tall buildings, their location is considered to be one that should be carefully considered in order to not detract from the nature of surrounding places and the quality of life for those living and working around them. Tall buildings are noted to be acceptable where LBH considers that they will not seriously harm the surrounding area and its heritage assets, and will also deliver wider benefits to the proposed Opportunity Area, and that the height of buildings should be appropriate to the surrounding townscape.
- 6.176 The policies of the emerging Local Plan Part 2 reinforce the Local Plan Part 1, through aiming to improve the quality of the built environment seeking to ensure

that new development is of high design quality, sustainable design and that it contributes positively to the local environment.

6.177 The Plan reiterates the findings of LBH's Townscape Character Assessment, which confirms that Uxbridge and Hayes are the most suitable locations for tall buildings in the Borough. Within town centre locations, tall buildings are noted as offering the potential to regenerate an area, and, when grouped together to form a cluster, can create and/or emphasise a point of civic or visual significance.

6.178 In order to enable the assessment of proposals against the criteria under Policy DMHB 10: High Buildings and Structures, the Council will require accurate visual representation (AVRs) to be submitted. In accordance with this Policy, AVRs have been undertaken for the TVIA, with their locations agreed with the LBH. The policy states that any proposal for a high building or structure will be required to:

- Be located in Hayes town centre and 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. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views; and
- Achieve high architectural quality and include design innovation.

6.179 In this planning policy context, an assessment of the scheme's townscape impact has been undertaken. As part of the visual appraisal, liaison with LBH has identified the relevant visual receptors to be included within the assessment from within the surrounding townscape, whereby the location of the 28 viewpoints considered in the assessment were agreed.

6.180 The conclusions of the submitted TVIA note that the Proposed Development is considered to respond positively to the aims of planning policy by positively protecting and enhancing the natural, built and historic environment, and improving the places in which people live and the effective re-use of previously developed land.

- 6.181 The scheme proposals are considered to be successfully accommodated within the Site and the surrounding townscape, and fully appropriate as a new residential area reflecting its location within a designated Housing Zone. In addition to new built form, new recreational opportunities will be created and access to the Grand Union Canal will be provided. The layout, height, form, massing and footprint of the scheme is proportionate to its location and wider townscape context and will provide a positive contribution to the skyline, meeting the requirements of London Plan Policy 7.7, LPP1 H1 and LPP2 Policy DMHB 10, which seeks high quality design and appropriate tall buildings.
- 6.182 The Proposed Development will also form a coherent part of the future townscape and other forthcoming schemes in Hayes, specifically the new Crossrail station and development sites on Nestles Avenue. As such, the sensitive arrangement and co-ordinated approach to both residential and commercial land uses on the site, in combination with the design quality and proximity to existing infrastructure, results in the scheme adhering to planning and design policies and is thus in accordance with the Development Plan.

Air Quality

- 6.183 The impact on air quality has been fully considered and has been assessed in the air quality section of the Environmental Statement. The NPPF, requires that *"The planning system should contribute to and enhance the natural and local environment by...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability."*
- 6.184 London Plan Policy 7.14 (Improving Air Quality) states that development proposals should:
- Promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following the best practice guidance in the Greater London Authority and London Councils;
 - Where biomass boilers are included, set out a detailed air quality assessment that should forecast pollutant concentrations. Permission should only be granted if no adverse impacts from biomass are identified; and

- Aim to be 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs).

6.185 LPP1 strategic objective SO11 aims to: "*address the impacts of climate change, and minimise emissions of carbon and local air quality pollution from new development and transport.*" and policy BE1 states that "*The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:*

- *10. Maximise the opportunities for all new homes to contribute to tackling and adapting climate change and reducing emissions of local air quality pollutants.*"

6.186 Policy EM1 also requires that areas with high carbon emissions should be targeted for additional carbon reductions through low carbon strategies. Policy EM8 requires conformity with air quality management area policies.

6.187 As noted in the air quality assessment in the Environmental Statement, the air quality impacts associated with the development, have been assessed. The site is located within the Hillingdon's AQMA, declared due to exceedances of the annual mean NO₂ objective.

6.188 The construction works have the potential to create dust and during construction it is recommended that a package of mitigation measures is put in place to minimise the risk of elevated PM₁₀ concentrations and dust nuisance in the surrounding area.

6.189 There are no predicted exceedances of air quality strategy objectives as a result of the Proposed Development and therefore mitigation against poor air quality for future residential receptors is not required.

6.190 There is no significant effect of development traffic on existing residential receptors in the vicinity of the Site and therefore no additional mitigation is required. The Proposed Development is therefore considered to comply with Policy DMEI of the emerging LPP2.

Noise and Vibration

- 6.191 Paragraph 11 of the NPPF requires that the *"planning system should contribute to and enhance the natural and local environment by...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution..."*
- 6.192 NPPF Paragraph 123 sets out that policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, by mitigating and reducing noise to a minimum, including through the use of conditions. In addition, the NPPF recognises that development will often create some noise.
- 6.193 Policy 7.15 of the London Plan requires development proposals to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of development proposals. LPP1 Policy EM8 promotes noise reduction and seeks to ensure that noise sensitive development is only permitted if noise impacts can be adequately controlled and mitigated. This is supported by Saved UDP Policies OE1, OE3 and OE5.
- 6.194 PBA has undertaken two assessments, a Noise assessment relating to the industrial part of the scheme and a Noise and Vibration Assessment for the residential part of the scheme. These assessments should be read together with the Noise and Vibration Planning Strategy Report.
- 6.195 The results of the environmental noise survey undertaken establish the current environmental noise climate around the site. In relation to the residential scheme, outline mitigation measures, including a glazing specification and the use of appropriate ventilation have been recommended in order for the development to achieve acceptable internal noise levels.
- 6.196 In relation to the industrial scheme, PBA's report recommends that a condition is attached to any future planning permission to require a plant noise assessment to be carried out at the appropriate stage of development, once the occupier requirements are known.
- 6.197 With the inclusion of the recommended mitigation measures where required, the proposals are considered to be acceptable with regards to noise and are in accordance with the NPPF, London Plan Policy 7.15 and the Local Plan.

Wind Assessment

- 6.198 A wind assessment has been submitted in support of the planning application to assess the wind microclimate around the Proposed Development. The ground level wind microclimate for the Proposed Development is expected to range from being acceptable for sitting use in the most sheltered areas through to walking use where the prevailing winds are channelled between buildings and interact with building corners during the windiest season. The range of wind conditions will be similar to that experienced at the existing site; however, the change in use (from an industrial site to a relatively more sensitive residential one) would necessitate wind mitigation in key areas, which are described in RWDI's report.
- 6.199 The report concludes that the wind microclimate around the Proposed Development is expected to have a similar range of conditions to the existing Site. For most areas, these conditions will remain suitable; however, due to the change in usage of the Site there will be localised instances of conditions that are too windy for the intended use.
- 6.200 It is expected these relatively windy conditions will be readily mitigated by way of the landscaping masterplan and the further required mitigation measures to produce wind conditions suitable for the intended pedestrian use.

Aviation

- 6.201 Whilst not a requirement for the purposes of the planning application, the applicants have commissioned Osprey, an aviation specialist, to consult with London Heathrow Airport in the pre-application process.
- 6.202 The site is located within the London Heathrow (LHR) Aviation Safeguarding Zone and therefore a pre-application meeting was held with the LHR safeguarding team on 18 August 2016, to discuss the upper limitation of building heights that could be provided on the site. It was confirmed in correspondence dated 13 October 2016 that the maximum building height on the site should be no greater than 67.93 m AOD.
- 6.203 Pre-application advice has also been given in relation to landscape planting, building & roof design and ecology. The masterplan proposals have been developed and co-ordinated to take on board these comments, so that the landscaping and building design (such as roofs) does not attract birds that could affect LHR's operations.

6.204 As a result of the pre-application consultation, the scheme design has been influenced by limitations set by LHR. Further details are contained in the accompanying aviation report prepared by Osprey Consulting Services.

6.205 The NPPF identifies key principles in relation to health that local planning authorities should consider. In particular Chapter 8 of the NPPF 'Promoting

Healthy and Cohesive Community

Health Impact Assessment

6.206 Healthy Communities' states that development proposals can support strong, vibrant and healthy communities.

6.207 Policy 3.2 of the London Plan states that the impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessment (HIA). For the purposes of HIA, a 'major development' comprises '10 or more residential units (or a site of 0.5 ha or more), or 1,000 square metres or more of non-residential floorspace (or a site area of 1.0 ha or more)'. The Proposed Development exceeds these thresholds.

6.208 A HIA has been undertaken by Barton Wilmore on behalf of the applicants, to assess the health impacts of the scheme. The assessment has been undertaken using the London Health Urban Development Unit (HUDU) Healthy Urban Planning Checklist and the HUDU Rapid Health Impact Assessment Tool. The assessment has reviewed the potential health effects of the Proposed Development and provided recommendations to seek to maximise health gains and remove or mitigate potential adverse impacts on health.

6.209 The performance of the Proposed Development has been assessed against 11 key health themes:

- Housing quality and design;
- Access to healthcare services and other social infrastructure;
- Access to open space and nature;
- Air quality, noise and neighboured amenity;
- Accessibility and active travel;
- Crime reduction and community safety;
- Access to healthy food;

- Access to work and training;
- Social cohesion and lifetime neighbourhoods;
- Minimising the use of resources; and
- Climate change.

6.210 The Proposed Development is found to have a positive health effect in relation to the majority of the key health themes. The Proposed Development has been designed to provide a high quality, attractive and healthy environment for future residents and users.

6.211 As part of the design of the scheme particular, attention has been given to creating a balanced, mixed-use community which meets local housing need and provides employment opportunities. In addition, the Proposed Development promotes active and sustainable travel, which encourages physical activity, including attractive and safe cycling and pedestrian facilities that connect to the wider area. The Proposed Development also include large areas of open space and the design team have incorporated multi-use open space including a running track and a trim-trail throughout the public and private areas which will provide a range of beneficial health effects.

6.212 The scheme has been assessed against the 11 key themes identified above and seeks to achieve a healthy environment. Further information can be found in the Health Impact Assessment, submitted with the planning application.

Equalities Impact Assessment

6.213 An Equalities Impact Assessment (EqIA) has been prepared in response to a request from LBH for an EqIA to accompany the planning application. The requirement to undertake the assessment stems from the Equality Act 2010 and Policies 3.1 and 4.12 of the London Plan seek to ensure equal life chances and improving opportunities for all.

6.214 Policy 3.5, Part B of the Housing Supplementary Planning Guidance, within the Neighbourhood section, states at paragraph 2.2.8 that "...An Equality Impact Assessment should be undertaken to ensure that the needs of all those with 'protected characteristics' are considered".

6.215 The assessment uses LBH's Equalities Impact Assessment Form as the basis for the report. It concludes that there are no negative impacts associated with the development in terms of equalities impacts and the development is suitable for

all protected characteristics, thus meeting the relevant planning policy requirements.

Ecology

- 6.216 NPPF Paragraph 9 seeks positive improvements in the quality of the natural environment including achieving net gains for nature and biodiversity. The NPPF seeks to minimise the impacts of development on biodiversity and geodiversity, and sets out guidance for local planning authorities to follow in developing policy.
- 6.217 London Plan Policy 7.19 states that development proposals should, where possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 6.218 LPP1 Policy EM7 seeks to protect and enhance protected species and priority species. It seeks the provision of biodiversity improvements where feasible, including the provision of green roofs and living walls.
- 6.219 LPP2 Emerging Policy DMEI 1 (Living Walls and Roofs and on-site Vegetation) states that all major development should incorporate living roofs and/or walls into the development. Emerging Policy DMEI 7 (Biodiversity Protection and Enhancement) states that all development alongside the Grand Union Canal will be expected to contribute to additional biodiversity improvements.
- 6.220 Two ecological appraisals have been undertaken in support of the planning application proposals. Aspect Ecology has undertaken an ecological appraisal on behalf of BL for the residential part of the development and Essex Mammal Surveys has prepared an ecological appraisal of the industrial aspect of the development.
- 6.221 The two ecological appraisal reports (and associated protected species report) have been undertaken independently of each other, although ongoing liaison between Aspect Ecology and Essex Mammal Surveys has ensured consistency throughout the appraisals.
- 6.222 The site was surveyed in March and April 2016 based on standard extended Phase 1 methodology. In addition, a general appraisal of faunal species was undertaken to record the potential presence of any protected, rare or notable species, with specific surveys conducted in respect of bats and badgers.

- 6.223 The reports confirm that no statutory or non-statutory nature conservation designations are present within the site. The non-statutory Grand Union Canal Site of Metropolitan Interest to Nature Conservation (SMINC) is located adjacent to the northern site boundary, but subject to the recommended mitigation measures set out in the reports, it is considered that this designation will be suitably safeguarded both during construction and in the long-term. All further designations within the surrounds of the site are unlikely to be affected by the Proposed Development.
- 6.224 The buildings and hardstanding on-site are considered to be of negligible ecological value and the loss of these features to the proposals is of negligible significance. The grassland and amenity planting is generally of low ecological value, whilst the semi-mature and mature trees are considered to be of moderate value at the local level. The proposed losses of amenity grassland and planting are of minor significance and will be offset by new landscape planting within the scheme. The mature trees are to be retained under the proposals and will be protected during construction.
- 6.225 The site generally offers limited opportunities for protected species, and evidence for the presence of any such species was limited to a very low number of foraging and commuting Common Pipistrelle, *Pipistrellus pipistrellus* and Soprano Pipistrelle, *Pipistrellus pygmaeus* bats and common birds. It is likely that birds are nesting within suitable habitat within the site and could therefore potentially be adversely affected by the proposals.
- 6.226 Appropriate mitigation measures, centred on the careful timing of works, will therefore be implemented to safeguard nesting birds during relevant site clearance works and if required further survey work of those limited number of buildings that have the potential for roosting bats. Long-term nesting opportunities will be maintained, if not enhanced, under the Proposed Development through new landscape planting and provision of nest boxes. The site also provides minor opportunities for the UK Priority Species Hedgehog and therefore recommendations for safeguards during vegetation clearance are proposed.
- 6.227 A number of enhancement proposals are also provided to ensure the scheme does not impede the operation of London Heathrow Airport, such as planting and bird boxes, in line with the advice set out in the aviation report prepared by Osprey, to mitigate bird air strike incidents.

6.228 The Proposed Development presents the opportunity to secure a number of net gains in biodiversity, including additional native tree planting, new roosting opportunities for bats, diverse nesting habitats for birds and the provision of green/brown roofs on the residential buildings.

6.229 In summary, the Proposed Development has sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered that the proposals will enhance the biodiversity of the site. Further information on the details of the scheme is contained within the Design and Access Statement accompanying the application.

Energy and Sustainability

Energy

6.230 The NPPF encourages local planning authorities to adopt proactive strategies to mitigate and adapt to climate change, paragraph 95 supports the move to a low carbon future and paragraph 97 seeks to increase low carbon energy. Policy 5.5 of the London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

1. Be Lean: use less energy;
2. Be Clean: supply energy efficiently; and
3. Be Green: use renewable energy.

6.231 Policy 5.2 also seeks new residential development to be zero carbon from 2016 and as per building regulations requirements for non-domestic buildings. A detailed energy assessment is required to demonstrate how the targets for carbon dioxide emission reductions have been met within the framework of the energy hierarchy.

6.232 Policy 5.6 of the London Plan seeks to ensure that new development evaluates the potential for connections to Combined Heat and Power (CHP) systems and states that major development proposals should select energy systems in accordance with the following hierarchy:

1. Connection to existing heating or cooling networks;
2. Site-wide CHP network; and

3. Communal heating and cooling.

- 6.233 London Plan Policy 5.7 seeks to increase the proportion of energy generated from renewable sources, setting an indicative target of 20% of energy generated for new developments to be from renewable sources.
- 6.234 LPP1 Policy EM1 seeks to ensure climate change mitigation is fully addressed. It will do this through a range of measures including prioritising higher density development in urban centres, promoting a reduction in car dependency, promoting the use of decentralised energy, and encouraging the installation of renewable energy measures.
- 6.235 LPP2 Emerging Policy DMEI 2 (Reducing Carbon Emissions) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. Major development must be accompanied by an energy assessment showing how these reductions will be achieved.
- 6.236 Emerging Policy DMEI 3 (Decentralised Energy) requires all major development to be designed to be able to connect to a Decentralised Energy Network.
- 6.237 Two energy statements are submitted in support of the planning application proposals. BBS has prepared an energy statement on behalf of BL for the residential part of the development and WPP has prepared an energy statement for SEGRO's industrial part of the proposals.
- 6.238 In relation to the residential element of the Proposed Development, the development proposals include passive energy savings and energy efficiency measures that reduce the carbon dioxide emissions by 2.80%, and the saving achieved by the provision of a CHP-based communal heating network, as a percentage of the baseline emissions, is 22.48%. The options for renewable energy systems were also considered. The roof design allows for the installation of PV panels with a total nominal rating of 378 kWp across the majority of apartment blocks. This will achieve a further reduction, as a percentage of the baseline emissions, of 9.95%. The total saving from all the measures combined is therefore 35.23%. This is short of the 100% mitigation now required, and it is anticipated that the remaining 64.77% of emissions will be covered by a carbon offset payment.

- 6.239 In relation to the industrial part of the scheme, the energy system is separate and not linked to the residential CHP. The focus of the energy strategy is on CO2 reduction from the building by adopting a highly efficient building envelope solution together with high efficiency mechanical and electrical services incorporating heat recovery. The renewable energy technologies assessment is based on using solutions that are technically proven with low maintenance implications taking into account the energy efficiency strategies being proposed in the current design. The analysis has shown that by incorporating passive and low energy design measures there is a predicted reduction in each individual unit and the development's annual CO2 emissions. Further details are set out in the assessments.
- 6.240 Overall, the Proposed Development has been demonstrated to meet the requirements of London Plan Policies 5.2 and 5.6, Policy EM1 and Emerging Policies DMEI 2 and DMEI 3.

Sustainability

- 6.241 Sustainable Development is at the heart of the NPPF, recognising that there is a presumption in favour of sustainable development, as stated in paragraph 14.
- 6.242 Policy 5.3 of the London Plan seeks sustainable design and construction and for proposals to demonstrate that sustainable design standards are integral to the development.
- 6.243 LPP1 Policy BE1 (Built Environment) requires all new development to improve and maintain the quality of the built environment to create successful and sustainable neighbourhoods. All new developments should achieve a satisfactory assessment rating in terms of the latest Building for Life Standards. Proposals should also maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants.
- 6.244 The industrial space has been assessed and will achieve the target of BREEAM 'very good' through a pre-assessment which is provided within the submitted Sustainability Statement and will assist in meeting future occupier expectations.

Residential

- 6.245 In developing the approach to sustainability, the Design Team has taken careful account of the nature of the site and its outer-London suburban location, albeit on a site that has been occupied by industrial buildings for more than a century.

The Proposed Development responds to the site history in many ways: retaining key historic building elements; adopting a layout that respects the remaining site ecology; and boldly celebrating the industrial aesthetic in the key group of new buildings that contains the Energy Centre with its distinctive external flues and highly visible photovoltaic panel arrays.

- 6.246 As well as building on the past, the Proposed Development looks forward, utilising the latest energy conservation and renewable energy technologies. The site-wide heating network will use heat from a CHP-based communal heating system, and the combustion plant has been specified to have the lowest possible emissions of atmospheric pollutants, ensuring that there will be a negligible impact on local air quality. This has been tested in the Environmental Statement.
- 6.247 Water use will be minimised in accordance with the latest national policy. The risk from future severe rainfall events has been carefully addressed, and the scheme incorporates an extensive system of surface water attenuation features that will ensure that the total rate of discharge of surface water can be reduced significantly compared to the current level. Finally, the proposals for ecological enhancement and landscaping retain and protect the remnant of woodland and incorporate new grassland, shrub, woodland and ground flora planting, and many new trees, and, with the new green roofs, will result in an increase in total green cover.
- 6.248 The Proposed Development therefore fully meet the requirements of The London Plan 2016 for Sustainable Development, and the equivalent local strategic policies in the London Borough of Hillingdon Local Plan Part 1, Policy BE1: Built Environment and Policy EM1: Climate Change Adaptation and Mitigation, as supported by a range of implementation policies the Local Plan Part 2.

Industrial

- 6.249 The submitted Sustainable and Construction report provides information on how the industrial buildings conform with relevant planning policy, considering measures in relation to water conservation, ecology & biodiversity, flood risk & SUDs, pollution, material, waste management, construction, noise and light pollution.
- 6.250 Given that high sustainability standards will be met, the Proposed Development is in line with the requirements of London Plan Policy 5.3 and LPP1 Policy BE1.

Overheating

- 6.251 Policy 5.9 of the London Plan requires major development proposals to reduce potential overheating and reliance on air conditioning systems and proposals should demonstrate how the design, materials, construction and operation of the development would minimise overheating and meet cooling needs.
- 6.252 In accordance with the GLA Guidance on Preparing Energy Assessments (2016), two overheating assessments have been undertaken, one in relation to the residential proposals, prepared by BBS and the other in relation to the industrial proposals, prepared by WPP.

Residential

- 6.253 The accompanying overheating assessment prepared by BBS concludes that in respect to summer overheating:
- Window sizes have been optimised, and none of the apartments have an overheating risk greater than “slight” when assessed in accordance with the relevant standards;
 - Windows to some ground floor apartments together with those on façades closest to the railway line will have solar control glazing as necessary;
 - Windows are generally recessed up to 200mm to provide shading, and significant shading is provided by balconies;
 - Low energy lighting and low-loss hot water cylinders will be installed in all dwellings to reduce undesirable internal gains;
 - A mix of green and brown roofs will create a positive impact on biodiversity and reduce the contribution from the buildings to the urban heat island effect;
 - A significant area of the roof of most of the blocks will be occupied by PV panel arrays, but it is envisaged that with suitable mounting arrangements this can be mounted above the green roof surface and create additional habitat diversity due to shading; and
 - It should be noted that the above are passive measures and that in addition to the above, mechanical cooling will also be installed.

Industrial

6.254 The office accommodation to each of the four industrial units have been analysed for the overheating risk and the following measures are proposed to minimise overheating:

- Openable windows albeit with a restricted opening to the office accommodation;
- High performance glazing;
- LED lighting to reduce internal heat gains; and
- Solar shading through brise soleil is provided by an overhang at the upper level of the office accommodation to each of the units.

6.255 Given the measures identified above, the Proposed Development is therefore compliant with the requirements of the Development Plan.

Archaeology

6.256 The NPPF states that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

6.257 The London Plan sets out guidance relating to archaeology at Policy 7.8, which states that "development should incorporate measures that identify record, interpret, protect and, where appropriate, present the site's archaeology."

6.258 LPP1 Policy HE1 seeks to conserve and enhance the borough's historic assets, including archaeologically significant areas. This is supported by LPP2 Emerging Policy DMHB 1 (Heritage Assets). Saved UDP Policy BE3 requires sites of archaeological interest to be investigated and recorded, wherever possible.

6.259 In accordance with government planning policy, (NPPF section 12 paragraph 128) a desk-based assessment has been undertaken to assess the archaeological interest of the site. There are no designated or non-designated archaeological assets on the site and none in the vicinity of the site; the Proposed Development will therefore not have an impact on any designated or non-designated archaeological assets.

- 6.260 The potential for as yet to be discovered archaeological assets is limited due to an episode of Brickearth extraction in the early 1900s and subsequent development. The archaeological potential relates solely to structural remains associated with the early 20th century munitions factory which may survive outside the footprint of the existing development.
- 6.261 On the basis of all the available information, it is considered that archaeological mitigation measures will be required. A programme of targeted archaeological investigation to determine levels of archaeological survival outside the existing footprint of the development, would therefore protect the archaeological interest of the site.
- 6.262 The archaeological mitigation could be secured by an appropriately worded planning condition.

Flood Risk and Drainage

- 6.263 Government guidance requires that consideration be given to flood risk in the planning process. The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in flood risk areas, it can be permitted provided it is made safe without increasing flood risk elsewhere.
- 6.264 The London Plan reiterates national policy guidance, and Policy 5.12 seeks to ensure development proposals comply with the flood risk assessment and management requirements set out in PPS 25.
- 6.265 London Plan Policy 5.2 sets out that development should address the issues of flood resilient design and emergency planning. Development should remain safe and operational under flood conditions and buildings should be designed for quick recovery following a flood. Policy 5.13 of the London Plan seeks to ensure that Sustainable Urban Drainage Systems are included in development proposals.
- 6.266 LPP1 Policy EM6 (Flood Risk Management) directs new development away from Flood Zones 2 and 3. LBH will require all development to use sustainable urban drainage systems (SUDS) and will encourage these to be linked to water efficiency methods. Saved UDP Policy OE8 will resist development which would result in an increased flood risk. LPP2 Emerging Policy DMEI 9 (Management of

Flood Risk) also requires development to make appropriate provision for flood risk mitigation.

- 6.267 The scheme proposals are supported by two Flood Risk Assessment and Drainage Strategies, one prepared by Capita for the industrial part of the proposals and the other prepared by Hydrock for the residential scheme. The approach to the drainage strategies has been developed between Capita and Hydrock to ensure a compliant solution for each part of the site, whilst also ensuring the strategies are complementary.
- 6.268 The Site is located in Flood Zone 1, so is at low risk of flooding from fluvial or tidal sources. Flood risk from other potential sources including canals and reservoirs, groundwater and public sewers is also assessed to be low.
- 6.269 Surface water drainage arrangements are proposed to comprise controlled off-site discharge to public sewer plus, for the northern half of the residential development and in agreement with the Canal and River Trust, controlled discharge into the adjacent Grand Union Canal.
- 6.270 In respect of discharge to public sewer, the rate is based as a maximum of three times the calculated greenfield runoff as specified in the London Plan (Supplementary Planning Guidance). This is to be achieved through the use of below ground storage vessels and, where possible, permeable paving acting as a tanked system. It is noted that ground investigations concluded that soakaway drainage is not feasible, due to poor infiltration characteristics and a relatively high water table.
- 6.271 The overall capacity of the surface water network has been calculated based on a 1 in 100 year return period storm, with an additional 20% climate change allowance for the industrial development and a 40% allowance for the more sensitive residential development. Complex flow controls are to be used to restrict the flows to the public sewer.
- 6.272 The foul water flows are to be collected by a gravity system and discharge off-site via existing Thames Water sewers in Nestles Avenue, subject to Section 106 public sewer connection agreements with Thames Water.
- 6.273 The Assessment concludes that the development is not at risk of flooding, that it can be safely carried out without increasing the risk of flooding to downstream or surrounding properties and that the development will put in place measures to ensure that surface water is appropriately managed.

6.274 The Proposed Development are therefore in accordance with national guidance, London Plan Policies 5.2, 5.12 and 5.13, LPP1 Policy EM6, Saved UDP Policy OE8, and LPP2 Emerging Policy DMEI 9.

6.275 The submitted Flood Risk Assessment and Drainage Strategies and the Design and Access Statement provides further information on the drainage strategy.

Land Contamination

6.276 The NPPF confirms that land contamination and its risk to health should be a material consideration under planning and development control. Section 109 of the NPPF states that “planning system should contribute to and enhance the natural and local environment by...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution...”.

6.277 Policy 5.21 of the Plan relates to contaminated land. It confirms that the Mayor supports the remediation of contaminated sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use. The policy states that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination. Borough Local Development Frameworks should encourage the remediation of contaminated sites and set out policy to deal with contamination.

6.278 LPP1 Strategic Objective SO10 is to “Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land” and Policy EM8 seeks mitigation strategies for development on contaminated land. Policy DMEI 12 of LPP2 requires planning applications on sites with potential contamination to be accompanied by an assessment of the likely contaminants.

6.279 The potential for land contamination has been assessed in two parts. Hydrock has undertaken a Desk Study and Ground Investigation assessment on behalf of BL for the residential part for the scheme and Capita has undertaken a Geo-Environmental Investigation and Assessment for SEGRO’s industrial part of the site. Both documents are submitted as technical appendices to the Land Contamination chapter of the Environmental Statement. Several phases of

ground investigations have been completed and these indicate that there are localised areas of contamination but there is not a high level of contamination present on site.

6.280 A full remediation strategy would be secured by planning condition(s), which will mitigate any harmful effects of identified contamination.

External Lighting, CCTV, Ventilation & Extraction and Utilities

6.281 The planning application is submitted with reports setting out details of external lighting, CCTV, ventilation and Utilities. These reports have been prepared by White Code of behalf of BL for the residential scheme and WPP on behalf of SEGRO for the industrial scheme.

6.282 These reports have been prepared to ensure compliance with LBH's planning application validation checklist and set out details of the proposals and/or requirements of planning conditions that could be attached to any future planning permission.

Summary

6.283 The planning issue topics identified above have been assessed against relevant planning policy to demonstrate the acceptability of the scheme. The main planning issues affecting the site have been assessed with particular regard given to:

- the principle of development;
- affordable housing;
- housing mix;
- residential design, amenity & privacy;
- daylight & sunlight;
- employment provision;
- proposed supporting uses;
- open space, children's play space and trees;
- heritage;
- transport and car parking;
- townscape, visual impact and tall buildings;
- air quality;
- noise and vibration;

- wind;
- aviation;
- healthy and cohesive communities;
- ecology;
- energy and sustainability (including overheating);
- archaeology;
- flood risk & drainage;
- land contamination; and
- external lighting, CCTV, ventilation, extraction & utilities.

6.284 The planning application is supported by a range of technical documents, which are set out in Section 1 and should be read in conjunction with this planning statement.

7.0 CIL and Planning Obligations Heads of Terms

- 7.1 In line with LBH's validation requirements and its Planning Obligations SPD (July 2014), the proposed Heads of Terms (HoTs) for the Section 106 Agreement planning obligations are set out below. The need for infrastructure related planning obligations has been superseded by the Community Infrastructure Levy (CIL), which has been adopted by both the Mayor and LBH.
- 7.2 The Mayor of London's CIL Charging Schedule was adopted on 1 April 2012 to fund the development of Crossrail. LBH is identified as a Zone 2 borough within the Mayoral CIL Charging Schedule and is chargeable at £35 per sq m of net additional GIA floorspace.
- 7.3 LBH's CIL Charging Schedule came into effect on 10 July 2014. The CIL rate for residential development (C3) is £95 per sq m, office (B1) use is £35 per sq m and industrial (B8) is £5 per sq m. The Council's Regulation 123 list sets out that the monies received from CIL will be used to fund the following types of infrastructure:
- Education facilities;
 - Transport improvements excluding site specific matters needed to make the development acceptable in planning terms;
 - Health care facilities;
 - Community care facilities (social care institutions providing for older people and people with mental health or learning disabilities);
 - Library services;
 - Leisure facilities (sports facilities defined as publicly owned leisure centres, gyms and swimming pools);
 - Open space provision: publicly accessible open space and allotments, excluding site specific matters needed to make the development acceptable in planning terms; and
 - Community facilities (community centres and meeting places but excluding places of worship; voluntary sector meeting places and centres and public cultural facilities).
- 7.4 CIL is to be calculated in accordance with Regulation 40 of The Community Infrastructure Levy Regulations 2010 which states that CIL is payable on the proposed uplift in floorspace (GIA). The Proposed Development is being

delivered in 7 separate phases, which means that for the purposes of CIL each phase is a separate chargeable development.

7.5 The proposed HoTs for a Section 106/278 Legal Agreements are set out below and have been developed, in line with the legal requirements set out in Community Infrastructure Levy Regulation 122, which states that planning obligations may only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

7.6 These tests are further reinforced at Paragraph 204 of the NPPF. The National Planning Policy Guidance (NPPG) recognises that any planning obligations must be fully justified and evidence and should not prevent development going forward.

7.7 The draft HoTs for the Section 106/278 legal agreements have been identified below. Consistent with the need to ensure that the residential and industrial elements of the proposed development can be delivered separately the relevant obligations have been identified for each land use.

7.8 These obligations would bind/be enforceable against the commercial phase and the residential phases separately to allow appropriate obligations to be apportioned to the different uses. The obligations will also bind each residential phase individually as it comes forward for development.

7.9 It is imperative for the delivery of the two parts of the scheme that any conditions or planning obligations are separate from each other, so that neither part of the development impedes the other's delivery.

7.10 The proposed HoTs are as follows:

Residential development

- Onsite Affordable Housing at 35% by habitable room;
- Sustainable Design and Construction;
- Safeguarded of land for future pedestrian bridge;
- Children's nursery provision;
- Financial contribution to improvements to canal boundary wall;
- Financial contribution to improvements to canal pedestrian movement;

- Onsite public art;
- Onsite Employment and Construction Training;
- Air quality mitigation, if required;
- Financial contribution to offset Zero Carbon homes;
- Financial contribution to the implementation of a Controlled Parking Zone (CPZ)
- Restriction on residents applying for a permit to park in any future CPZ
- Residential Travel Plan;
- Management and Maintenance of Onsite Public Realm;
- Contribution Bulls Bridge Roundabout improvements
- Offsite Highway Improvements, to include (either financial contribution or s278 to secure):
 - Dawley Road/Botwell Road junction improvements;
 - Dawley Road/Kestrel Way/Betam Way Roundabout junction and kerb adjustment improvements;
 - Harold Avenue right turn improvements; and
 - Station Road surface marking amendments;
- Onsite Car Club and resident membership;
- Bus capacity and connection improvements; and
- S106 Monitoring Contribution.

Industrial development

- Sustainable design and construction;
- Onsite employment and construction training;
- Framework Industrial Travel Plan;
- Management and maintenance of onsite public realm including trim trail
- Financial contribution to canal boundary/pedestrian movement, proportional to the amount of industrial frontage on the canal;
- On-site public art; and
- S106 Monitoring contribution.

7.11 In addition to the above planning obligations, the following financial benefits will arise from the proposed development:

- CIL revenue;
- New Homes Bonus (additional bonus for affordable housing units);
- Additional Council Tax Revenue; and
- Additional Business Rates Revenue.

Summary

- 7.12 The proposed development's CIL liability will provide a significant amount of monies to contribute to the social and physical infrastructure identified in LBH's Regulation 123 list. Together with the site specific improvements identified in the s106/s278 draft Heads of Terms, any impacts of the scheme are made acceptable through the comprehensive mitigation package propose

8.0 Conclusion and Summary of Benefits

8.1 This planning statement has been prepared in support of an application seeking full planning permission and conservation area consent for demolition for the following:

"Part-demolition of existing factory buildings and associated structures, and redevelopment to provide 1,381 dwellings (Use Class C3), office, retail, community and leisure uses (Use Classes A1/A3/A4/B1/B8/D1/D2), 22,663 sq m (GEA) of commercial floorspace (Use Classes B1c/B2/B8 and Data Centre (sui generis)), amenity and playspace, landscaping, allotments, access, service yards, associated car parking and other engineering works".

8.2 The site is located at the former Nestlé factory, Nestles, Avenue, Hayes, UB3 4RF, in the southern part of the London Borough of Hillingdon (LBH), west London. It is located approximately 500 metres to the south-east of Hayes Town Centre, bounded to the north by the Great Western Rail Line and Grand Union Canal and to the south by Nestles Avenue.

8.3 The site is located in Hayes, which is a key area of strategic growth and forms part of the London Plan Heathrow Opportunity Area, which covers an area of approximately 700 ha. The opportunity area has an indicative employment capacity of 12,000 new jobs and the potential to create 9,000 new homes. The London Plan also specifically recognises the Hayes-West Drayton corridor as being able to offer a range of redevelopment opportunities, including small business parks, logistics and mixed uses.

8.4 The site is also part of the Hayes Town Centre Housing Zone, with the GLA anticipating a total investment to the value of £1 billion, with £39 million of funding from the GLA. It is anticipated that with the 238 hectares allocated in the housing zone area, 2,788 new homes will be delivered, including 847 affordable dwellings.

8.5 The Proposed Development has been designed with full regard given to the relevant planning policy framework, conforming to national, regional and local requirements and responds to the emerging planning policy context to provide more homes and create employment opportunities.

8.6 The planning application proposals are submitted after extensive pre-application discussions with the London Borough of Hillingdon, Greater London Authority,

Historic England and through engagement with the local community and key stakeholders.

8.7 The main planning issues affecting the site have been assessed with regard given to: the principle of development; affordable housing; housing mix; residential design, amenity & privacy; daylight & sunlight; employment provision; proposed supporting uses; open space, children's play space and trees; heritage; transport and car parking; townscape, visual impact and tall buildings; air quality; noise and vibration; wind; aviation; healthy and cohesive communities; ecology; energy and sustainability (including overheating); archaeology; flood risk & drainage; land contamination; and external lighting, CCTV, ventilation, extraction & utilities. The planning application is supported by a range of technical documents, the comprehensive list is provided in Table 1.

8.8 In the overall assessment of the scheme, the Proposed Development would deliver a significant number of public benefits, as follows:

- The redevelopment of a redundant, brownfield site in a strategic location that seeks to positively contribute to the wider area and meet the principles of strategic planning policy and Housing Zone aspirations;
- The development of a masterplan that considers the site in context with surrounding development sites, with its layout promoting permeability and linkages with neighbouring sites, particularly to Hayes town centre, the train station and Crossrail service;
- The layout of the masterplan provides ready compatibility for future development proposals for adjoining land owners;
- The enhancement of the conservation area and on-site heritage assets, to include the retention of locally listed buildings, structures and main factory building façades;
- High quality architectural design responding to the constraints and opportunities presented by the site, providing an exemplar of how residential uses successfully co-exist with industrial/employment uses;
- A very generous amount of publicly accessed open space (over 3 hectares) is proposed, opening up the previously private factory gardens to public access for the first time as well as children's playspace, semi-private courtyards and private amenity areas;
- A new canalside walkway and access to the Grand Union Canal will be created which will provide a new pedestrian route along the canal,

increasing activity and further enhancing the use of and connection to the canal, meeting the aims of the Blue Ribbon Network;

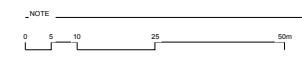
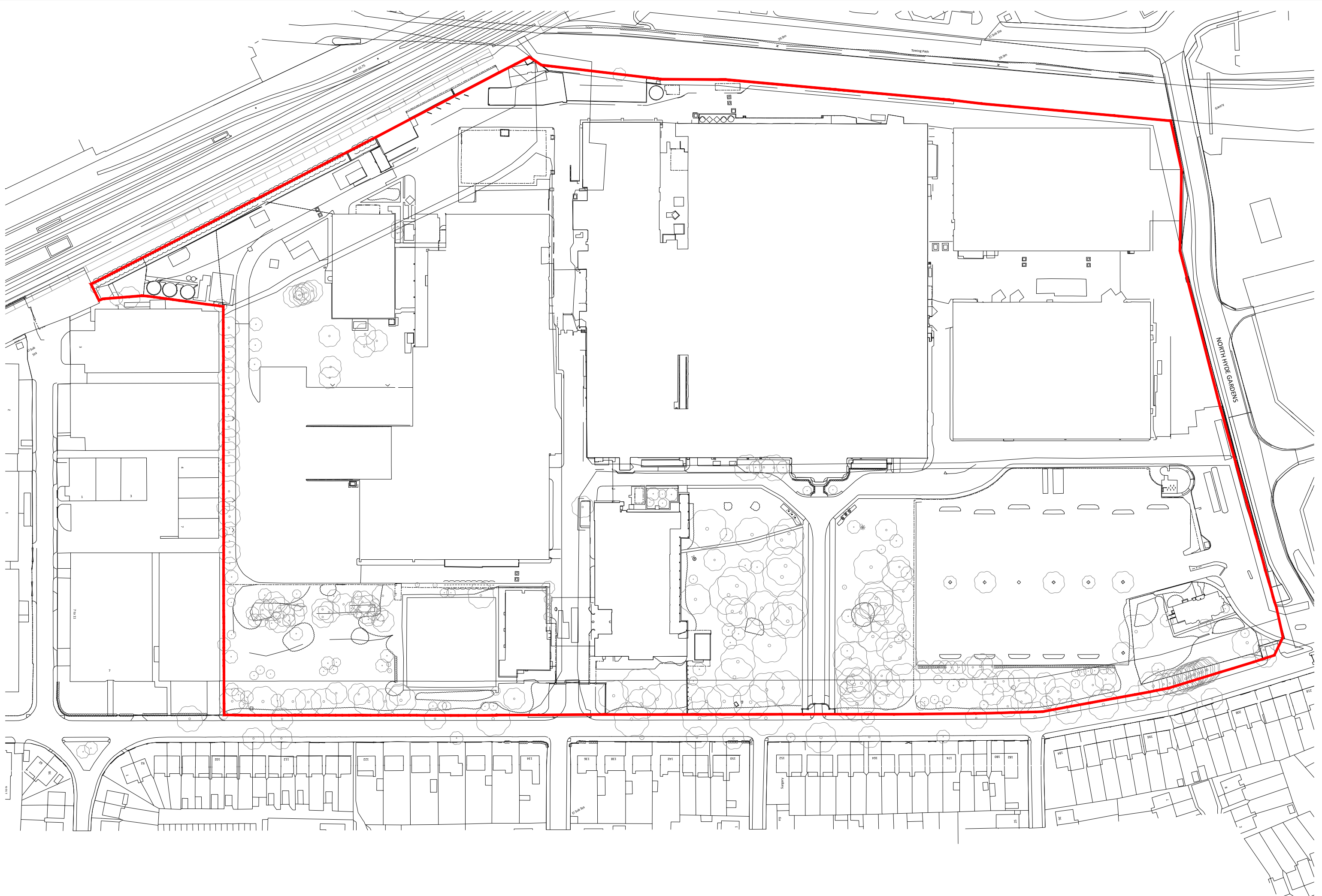
- The new buildings comprise high quality architectural design and will provide an attractive and safe place for people to live, work and visit;
- The delivery of 1,381 new homes, a significant proportion of the new homes to be delivered in the designated Housing Zone. A mix of unit sizes are proposed including family dwellings;
- The delivery of affordable housing, the applicants are seeking to provide 35% by habitable room, overall. The tenure split is proposed to be 30% low cost rent (London Affordable Rent), 30% intermediate product (shared ownership) and 40% intermediate (shared ownership);
- The proposed residential units have been designed to be high quality and to comply (and where possible to exceed) with the National Technical Standards and the Mayor's Housing Design Standards;
- The provision of 0.5 car parking spaces per residential unit, with an overall site total of 860 spaces in podium undercroft, basement and on street as well as 2,258 cycle parking spaces;
- 22,663 sq m of employment floorspace, comprising light industrial, research and development, warehousing, data centre and ancillary offices, which will provide up to 536 full-time equivalent employment opportunities for local people.
- The industrial units will be high specification and will achieve BREEAM Very Good;
- The provision of supporting uses to create a sense of community and place, to include a children's day nursery, a gym, café, small scale office suites and a flexible use community space;
- The high quality landscape scheme and the proposed planting, will enhance the public realm increase the ecological benefits of the site and contribution to local biodiversity; and
- The Proposed Development will also generate a range of financial benefits including New Homes Bonus, Council Tax generation, Business Rates, Zero Carbon Homes, Community Infrastructure Levy (CIL) and other site specific planning mitigation measures.

Summary

8.9 This planning statement has assessed the Proposed Development against the relevant planning policy framework. Whilst the proposed land use is a departure from the Development Plan, there are compelling material considerations that

justify and support a mixed use residential and industrial development on the site. The Proposed Development itself is compliant with the development plan, with mitigation measures proposed, and offers significant benefits. It therefore is considered acceptable in assessing the overall planning balance.

**APPENDIX 1
SITE PLAN**



DATE	REV	DESCRIPTION	CHK	ARCHITECT	CLIENT	KEY PLAN	NORTH
2023	1	ISSUE FOR PERMIT APPLICATION	AK	MAKOWER ARCHITECTS	BARRATT		
2023	2	REVISED PERMIT APPLICATION	AK	MAKOWER ARCHITECTS	BARRATT		
2023	3	REVISED PERMIT APPLICATION	AK	MAKOWER ARCHITECTS	BARRATT		

ARCHITECT: MAKOWER ARCHITECTS
 CLIENT: BARRATT
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 Roperide, London SE1 0UE
 Telephone: 020 7403 1000
 Website: www.makower.com

SCALE: 1:500 @ A0
 REVISION: P2

065 - A0-500
 EXISTING PLAN

**APPENDIX 2
DRAWING LIST**

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PLANNING APPLICATION DRAWING LIST

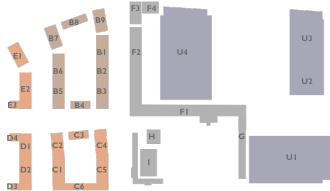
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MASTERPLAN SHEETS

Sheet #	Title	Size	Scale	
MP 0 11	Masterplan: Location Plan	A0	NA	P1
MP 0 12	Masterplan: Context Roof Plan - Application	A0	1:1000	P1
MP 0 13	Masterplan: Context Roof Plan - Illustrative Wider Area M'plan	A0	1:1000	P1
MP 0 20	Site Location Plan Existing	A0	1:1000	P1
MP 0 21	Site Block Plan Existing	A0	1:500	P1
MP 0 31	Masterplan: Existing Survey Plan	A0	1:500	P1
MP 0 41	Masterplan: Demolition	A0	1:500	P1
MP 0 42	Masterplan: Demolition - Site Photos	A0	NA	P1
MP 0 51	Masterplan: Block Plan Data Summary & Setting out	A0	1:500	P1
MP 0 60	Masterplan: Amenity Diagram	A0	1:500	P1
MP 1 00	Masterplan: Ground Floor Plan	A0	1:500	P1
MP 1 01	Masterplan: First Floor Plan	A0	1:500	P1
MP 1 02	Masterplan: Second Floor Plan	A0	1:500	P1
MP 1 03	Masterplan: Third Floor Plan	A0	1:500	P1
MP 1 04	Masterplan: Fourth Floor Plan	A0	1:500	P1
MP 1 05	Masterplan: Fifth Floor Plan	A0	1:500	P1
MP 1 06	Masterplan: Sixth Floor Plan	A0	1:500	P1
MP 1 07	Masterplan: Seventh Floor Plan	A0	1:500	P1
MP 1 08	Masterplan: Eighth Floor Plan	A0	1:500	P1
MP 1 09	Masterplan: Ninth Floor Plan	A0	1:500	P1
MP 1 10	Masterplan: Tenth Floor Plan	A0	1:500	P1
MP 1 11	Masterplan: Roof Height - AOD	A0	1:500	P1
MP 1 12	Masterplan: Roof Height - Storeys	A0	1:500	P1
MP 1 13	Masterplan: Roof PVs	A0	1:500	P1
MP 1 14	Masterplan: Roof Height - Color Coded	A0	1:500	P1
MP 2 01	Masterplan: Elevations (1)	A0	1:500	P1
MP 2 02	Masterplan: Elevations (2)	A0	1:500	P1
MP 2 03	Masterplan: Elevations (3)	A0	1:500	P1
MP 3 01	Masterplan: Sections	A0	1:500	P1
MP 3 02	Masterplan: Spaces	A0	NA	P1
MP 7 11	Masterplan: Accessible Units	A0	1:1000	P1
MP 7 12	Masterplan: Accessible Units	A0	1:1000	P1
MP 7 21	Masterplan: Cycles & Car Parking, Waste and Services	A0	1:1000	P1

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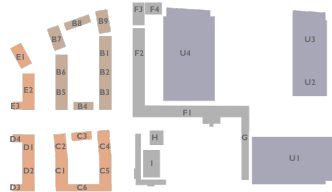
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BLOCK B SHEETS

Sheet #	Title	Size	Scale	
MA 1 00	Block B: Basement Floor Plan	A0	1:200	P1
MA 1 01	Block B: Ground & First Floor Plan	A0	1:200	P1
MA 1 02	Block B: Second & Third Floor Plan	A0	1:200	P1
MA 1 03	Block B: Fourth & Fifth Floor Plan	A0	1:200	P1
MA 1 04	Block B: Sixth and Seventh Floor Plan	A0	1:200	P1
MA 1 05	Block B: Eighth and Tenth Floor Plan	A0	1:200	P1
MA 1 06	Block B: Tenth & Roof Floor Plan	A0	1:200	P1
MA 2 01	Block B: Elevations (1)	A0	1:200	P1
MA 2 02	Block B: Elevations (2)	A0	1:200	P1
MA 2 03	Block B: Perspective Elevations	A0	NA	P1
MA 3 01	Block B: Sections (1)	A0	1:200	P1
MA 5 00	Block B: Unit Types - Studios	A1	1:50	P1
MA 5 01	Block B: Unit Types - Studios	A1	1:50	P1
MA 5 02	Block B: Unit Types - Studios	A1	1:50	P1
MA 5 10	Block B: Unit Type - 1 Bed Flats	A1	1:50	P1
MA 5 11	Block B: Unit Type - 1 Bed Flats	A1	1:50	P1
MA 5 12	Block B: Unit Type - 1 Bed Flats	A1	1:50	P1
MA 5 20	Block B: Unit Type - 2 Bed Flats	A1	1:50	P1
MA 5 21	Block B: Unit Type - 2 Bed Flats	A1	1:50	P1
MA 5 22	Block B: Unit Type - 2 Bed Flats	A1	1:50	P1
MA 5 23	Block B: Unit Type - 2 Bed Flats	A1	1:50	P1
MA 5 24	Block B: Unit Type - 2 Bed Flats	A1	1:50	P1
MA 5 25	Block B: Unit Type - 2 Bed Flats	A1	1:50	P1
MA 5 30	Block B: Unit Type - 3 Bed Flats	A1	1:50	P1
MA 5 31	Block B: Unit Type - 3 Bed Flats	A1	1:50	P1
MA 5 32	Block B: Unit Type - 3 Bed Flats	A1	1:50	P1
MA 5 40	Block B: Unit Type - 3 Bed Duplexes	A1	1:50	P1
MA 5 41	Block B: Unit Type - 3 Bed Duplexes	A1	1:50	P1
MA 5 42	Block B: Unit Type - 3 Bed Duplexes	A1	1:50	P1
MA 5 50	Block B: Unit Type - Accessible Flats	A1	1:50	P1
MA 5 51	Block B: Unit Type - Accessible Flats	A1	1:50	P1
MA 5 52	Block B: Unit Type - Accessible Flats	A1	1:50	P1
MA 5 53	Block B: Unit Type - Accessible Flats	A1	1:50	P1
MA 5 54	Block B: Unit Type - Accessible Flats	A1	1:50	P1
MA 6 01	Block B: Entrance Lobby (1)	A1	1:50	P1
MA 6 02	Block B: Entrance Lobby (2)	A1	1:50	P1
MA 6 03	Block B: Entrance Lobby (3)	A1	1:50	P1
MA 6 05	Block B: Entrance Podium (1)	A1	1:50	P1

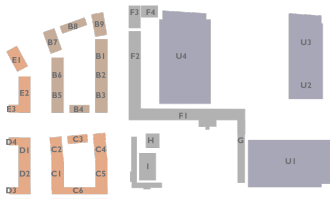
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BLOCK B SHEETS

Sheet #	Title	Size	Scale	
MA 6 06	Block B: Entrance Podium (2)	A1	1:50	PI
MA 6 11	Block B: Bay Study (1)	A1	1:50	PI
MA 6 12	Block B: Bay Study (2)	A1	1:50	PI
MA 6 13	Block B: Bay Study (3)	A1	1:50	PI
MA 6 14	Block B: Bay Study (4)	A1	1:50	PI
MA 6 15	Block B: Bay Study (5)	A1	1:50	PI
MA 6 16	Block B: Bay Study Elevations	A1	1:250	PI
MA 6 20	Block B: Details (1)	A1	1:20	PI
MA 6 30	Block B: Balconies	A1	NA	PI
MA 6 31	Block B: Balcony Type A1-A2	A1	1:25	PI
MA 6 32	Block B: Balcony Type A3-B1	A1	1:25	PI
MA 6 33	Block B: Balcony Type B2-C1	A1	1:25	PI
MA 6 34	Block B: Balcony Type D1-D2	A1	1:25	PI
MA 6 35	Block B: Balcony Type D3-E1	A1	1:25	PI
MA 6 36	Block B: Balcony Type F1	A1	1:25	PI
MA 6 37	Block B: Balcony Type F2-F3	A1	1:25	PI
MA 6 39	Block B: Waste & Cycle Diagrams	A0	1:200	PI
MA 6 40	Block B: Typical Bin Storage	A1	1:50	PI
MA 6 41	Block B: Bin Storage	A1	1:50	PI
MA 6 42	Block B: Cycle Storage	A1	1:50	PI
MA 7 51	Block B: Brick Types	A1	1:500	PI

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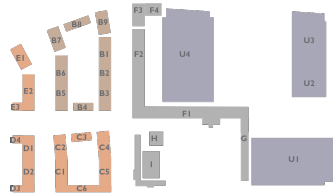
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BLOCK C, D & E SHEETS

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Sheet #	Title	Size	Scale	
HB 0 00	Site Overview Plan	A0	1:300	P1
HB 1 00	Block C & D: Ground Floor Plan	A0	1:200	P1
HB 1 01	Block C & D: First Floor Plan	A0	1:200	P1
HB 1 02	Block C & D: Second Floor Plan	A0	1:200	P1
HB 1 03	Block C & D: Third Floor Plan	A0	1:200	P1
HB 1 04	Block C & D: Fourth Floor Plan	A0	1:200	P1
HB 1 05	Block C & D: Fifth Floor Plan	A0	1:200	P1
HB 1 06	Block C & D: Sixth Floor Plan	A0	1:200	P1
HB 1 07	Block C & D: Seventh Floor Plan	A0	1:200	P1
HB 1 08	Block C & D: Eighth Floor Plan	A0	1:200	P1
HB 1 09	Block C & D: Roof Floor Plan	A0	1:200	P1
HB 1 10	Block E: Ground & First Floor Plan	A0	1:200	P1
HB 1 11	Block E: Second & Third Floor Plan	A0	1:200	P1
HB 1 12	Block E: Fourth & Fifth Floor Plan	A0	1:200	P1
HB 1 13	Block E: Sixth & Seventh Floor Plan	A0	1:200	P1
HB 1 14	Block E: Eight & Ninth Floor Plan	A0	1:200	P1
HB 1 15	Block E: Tenth & Roof Floor Plan	A0	1:200	P1
HB 2 00	Block C1: All Floor Plans	A0	1:100	P1
HB 2 01	Block C2: All Floor Plans	A0	1:100	P1
HB 2 02	Block C3: All Floor Plans	A0	1:100	P1
HB 2 03	Block C4: All Floor Plans	A0	1:100	P1
HB 2 04	Block C5: All Floor Plans	A0	1:100	P1
HB 2 05	Block C6: All Floor Plans	A0	1:100	P1
HB 2 06	Block D1, D4: All Floor Plans	A0	1:100	P1
HB 2 07	Block D2, D3: All Floor Plans	A0	1:100	P1
HB 2 09	Block E1: All Floor Plans	A0	1:100	P1
HB 2 10	Block E2, E3: All Floor Plans	A0	1:100	P1
HB 3 01	Unit Type - Studios	A1	1:50	P1
HB 3 02	Unit Type - 1 Bed Flats	A1	1:50	P1
HB 3 03	Unit Type - 2 Bed Flats	A1	1:50	P1
HB 3 04	Unit Type - 2 Bed Duplexes	A1	1:50	P1
HB 3 05	Unit Type - 3 Bed Flats	A1	1:50	P1
HB 3 06	Unit Type - 3 Bed Duplexes	A1	1:50	P1
HB 3 09	Unit Type - 1 Bed Accessible Flats	A1	1:50	P1
HB 3 10	Unit Type - 2 Bed Accessible Flats	A1	1:50	P1
HB 3 13	Unit Type - 3 Bed Duplexes (2)	A1	1:50	P1
HB 3 14	Unit Type - 2 Bed Flats (2)	A1	1:50	P1

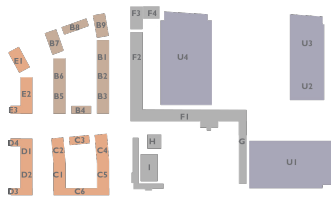
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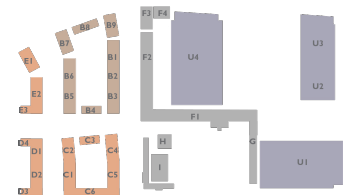
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HB 3 12	Typical Entrance Lobbies	A0	1:20	PI
HB 4 01	Elevation - Milk Street East	A0	1:200	PI
HB 4 02	Elevation - Nestles Avenue South	A0	1:200	PI
HB 4 03	Elevation - Milk Street West	A0	1:200	PI
HB 4 04	Elevation - Sandow Square North	A0	1:200	PI
HB 4 05	Elevation Canal Street East	A0	1:200	PI
HB 4 06	Elevation - Milk Yard West	A0	1:200	PI
HB 4 07	Section - Podium Garden South	A0	1:200	PI
HB 4 08	Section - Podium Garden North/East	A0	1:200	PI
HB 4 10	Elevation - E1	A0	1:200	PI
HB 5 00	Bay Study - Roof Extension	A0	1:20	PI
HB 5 01	Bay Study - Typical Block	A0	1:20	PI
HB 5 02	Bay Study - Entrance	A0	1:20	PI
HB 5 03	Bay Study - C3 Block	A0	1:20	PI
HB 5 04	Bay Study - E1 Block	A0	1:20	PI
HB 5 06	Bay Study - E1 Bridge	A0	1:20	PI
HB 5 07	Bay Study - 2 Bed Standard	A0	1:20	PI
HB 5 08	Bay Study - Energy Centre	A0	1:20	PI
HB 5 12	Bay Study - C6 Block	A0	1:20	PI
HB 5 13	Bay Study - Sandow Square E3	A0	1:20	PI
HB 6 01	Block C& D : Podium Deck and Accessible Roof Terraces	A0	1:200	PI
HB 6 02	Servicing Strategy	A0	As Ind.	PI
HB 6 03	Cycle Strategy	A0	As Ind.	PI

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BLOCK F, G, H & I SHEETS

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Sheet #	Title	Size	Scale	
DM 0 00	Block F, G, H & I: Cover Page	A0	NTS	
DM 0 20	Block F1, F2, F3, F4, G, H & I: Constraints Plan	A0	1:500	
DM 0 30	Block F: Existing Survey Plan	A0	1:500	
DM 0 31	Block G: Existing Survey Plan	A0	1:500	
DM 0 32	Block H & I: Existing Survey Plan	A0	1:500	
DM 0 40	Block F: Demolition (1)	A0	1:500	
DM 0 42	Block H & I: Demolition (1)	A0	1:500	
DM 1 00	Block F1, G, H & I: Ground Floor Plan	A0	1:200	PI
DM 1 01	Block F2, F3, F4: Ground Floor Plan	A0	1:200	PI
DM 1 02	Block F1, G, H & I: First Floor Plan	A0	1:200	PI
DM 1 03	Block F2, F3, F4: First Floor Plan	A0	1:200	PI
DM 1 04	Block F1, G, H & I: Second Floor Plan	A0	1:200	PI
DM 1 05	Block F2, F3, F4: Second Floor Plan	A0	1:200	PI
DM 1 06	Block F1, G, H & I: Third Floor Plan	A0	1:200	PI
DM 1 07	Block F2, F3, F4: Third Floor Plan	A0	1:200	PI
DM 1 08	Block F1, G, H & I: Fourth Floor Plan	A0	1:200	PI
DM 1 09	Block F2, F3, F4: Fourth Floor Plan	A0	1:200	PI
DM 1 10	Block F1, G, H & I: Fifth Floor Plan	A0	1:200	PI
DM 1 11	Block F2, F3, F4: Fifth Floor Plan	A0	1:200	PI
DM 1 12	Block F1, G, H & I: Roof Floor Plan	A0	1:200	PI
DM 1 13	Block F2, F3, F4: Sixth Floor Plan	A0	1:200	PI
DM 1 14	Block F2, F3, F4: Seventh Floor Plan	A0	1:200	PI
DM 1 15	Block F2, F3, F4: Eighth Floor Plan	A0	1:200	PI
DM 1 16	Block F2, F3, F4: Ninth Floor Plan	A0	1:200	PI
DM 1 17	Block F2, F3, F4: Tenth Floor Plan	A0	1:200	PI
DM 1 18	Block F2, F3, F4: Roof Floor Plan	A0	1:200	PI
DM 2 00	Block F1, F2, F3 & F4: South & West Elevations	A0	1:200	PI
DM 2 01	Block F1, F2, F3 & F4: North & East Elevations	A0	1:200	PI
DM 2 02	Block F3 & F4: North & South Elevations	A0	1:200	PI
DM 2 03	Block G: Elevations	A0	1:200	PI
DM 2 04	Block H & I: Elevations	A0	1:200	PI
DM 3 00	Section AA, BB & CC	A0	1:200	PI
DM 3 01	Section DD, EE & FF	A0	1:200	PI
DM 3 02	Section GG & HH	A0	1:200	PI
DM 4 00	Block F1: Ground Floor Plan	A0	1:100	PI
DM 4 01	Block F1: First Floor Plan	A0	1:100	PI
DM 4 02	Block F1: Second Floor Plan	A0	1:100	PI
DM 4 03	Block F1: Third Floor Plan	A0	1:100	PI
DM 4 04	Block F1: Fourth Floor Plan	A0	1:100	PI

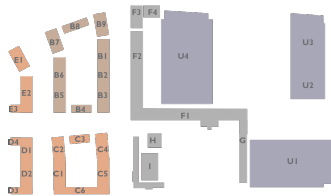
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BLOCK F, G, H & I SHEETS

Sheet #	Title	Size	Scale	
DM 4 05	Block F1: Roof Floor Plan	A0	1:100	PI
DM 4 10	Block F2: Ground Floor Plan	A0	1:100	PI
DM 4 11	Block F2: First Floor Plan	A0	1:100	PI
DM 4 12	Block F2: Second Floor Plan	A0	1:100	PI
DM 4 13	Block F2: Third Floor Plan	A0	1:100	PI
DM 4 14	Block F2: Fourth Floor Plan	A0	1:100	PI
DM 4 15	Block F2: Fifth Floor Plan	A0	1:100	PI
DM 4 16	Block F2: Roof Floor Plan	A0	1:100	PI
DM 4 20	Block F3 & F4: Ground Floor Plan	A0	1:100	PI
DM 4 21	Block F3 & F4: First Floor Plan	A0	1:100	PI
DM 4 22	Block F3 & F4: Second Floor Plan	A0	1:100	PI
DM 4 23	Block F3 & F4: Third Floor Plan	A0	1:100	PI
DM 4 24	Block F3 & F4: Fourth Floor Plan	A0	1:100	PI
DM 4 25	Block F3 & F4: Fifth Floor Plan	A0	1:100	PI
DM 4 26	Block F3 & F4: Sixth Floor Plan	A0	1:100	PI
DM 4 27	Block F3 & F4: Seventh Floor Plan	A0	1:100	PI
DM 4 28	Block F3 & F4: Eighth Floor Plan	A0	1:100	PI
DM 4 29	Block F3 & F4: Ninth Floor Plan	A0	1:100	PI
DM 4 30	Block F3 & F4: Tenth Floor Plan	A0	1:100	PI
DM 4 31	Block F3 & F4: Roof Floor Plan	A0	1:100	PI
DM 4 40	Block G: Ground Floor Plan	A0	1:100	PI
DM 4 41	Block G: First Floor Plan	A0	1:100	PI
DM 4 42	Block G: Second Floor Plan	A0	1:100	PI
DM 4 43	Block G: Third Floor Plan	A0	1:100	PI
DM 4 44	Block G: Fourth Floor Plan	A0	1:100	PI
DM 4 45	Block G: Roof Floor Plan	A0	1:100	PI
DM 4 50	Block H & I: Ground Floor Plan	A0	1:100	PI
DM 4 51	Block H & I: First Floor Plan	A0	1:100	PI
DM 4 52	Block H & I: Second Floor Plan	A0	1:100	PI
DM 4 53	Block H & I: Third Floor Plan	A0	1:100	PI
DM 4 54	Block H & I: Fourth Floor Plan	A0	1:100	PI
DM 4 55	Block H & I: Fifth Floor Plan	A0	1:100	PI
DM 4 56	Block H & I: Roof Floor Plan	A0	1:100	PI
DM 5 00	Unit Types: Studio Flats	A1	1:50	PI
DM 5 01	Unit Types: Studio Flats	A1	1:50	PI
DM 5 02	Unit Types: Studio Flats	A1	1:50	PI
DM 5 10	Unit Types - 1B Flats	A1	1:50	PI
DM 5 11	Unit Types - 1B Flats	A1	1:50	PI
DM 5 12	Unit Types - 1B Flats	A1	1:50	PI
DM 5 13	Unit Types - 1B Flats	A1	1:50	PI
DM 5 14	Unit Types - 1B Flats	A1	1:50	PI
DM 5 15	Unit Types - 1B Flats	A1	1:50	PI
DM 5 20	Unit Types - 2B Flats	A1	1:50	PI
DM 5 21	Unit Types - 2B Flats	A1	1:50	PI
DM 5 22	Unit Types - 2B Flats	A1	1:50	PI
DM 5 23	Unit Types - 2B Flats	A1	1:50	PI

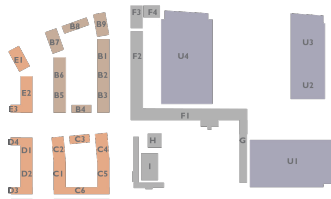
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BLOCK F, G, H & I SHEETS

Sheet #	Title	Size	Scale	
DM 5 24	Unit Types - 2B Flats	A1	1:50	PI
DM 5 25	Unit Types - 2B Flats	A1	1:50	PI
DM 5 26	Unit Types - 2B Flats	A1	1:50	PI
DM 5 30	Unit Types - 3B Flats	A1	1:50	PI
DM 5 31	Unit Types - 3B Flats	A1	1:50	PI
DM 5 32	Unit Types - 3B Flats	A1	1:50	PI
DM 5 33	Unit Types - 3B Flats	A1	1:50	PI
DM 5 40	Unit Types - M4.3 Adaptable Flats	A1	1:50	PI
DM 5 41	Unit Types - M4.3 Adaptable Flats	A1	1:50	PI
DM 5 42	Unit Types - M4.3 Adaptable Flats	A1	1:50	PI
DM 6 00	Block F1: Bay Study	A1	1:50	PI
DM 6 01	Block F2: Bay Study	A1	1:50	PI
DM 6 02	Block F2: Bay Study (Rear Façade)	A1	1:50	PI
DM 6 03	Block F3: Bay Study	A1	1:50	PI
DM 6 04	Block F4: Bay Study	A1	1:50	PI
DM 6 05	Block G: Bay Study	A1	1:50	PI
DM 6 06	Block H: Bay Study	A1	1:50	PI
DM 6 07	Block I: Bay Study	A1	1:50	PI
DM 6 09	Block F2: Entrance Study (Rear Façade)	A1	1:20	PI
DM 6 10	Block F1: Entrance Study	A1	1:20	PI
DM 6 11	Block F2: Entrance Study	A1	1:20	PI
DM 6 12	Block F3 & F4: Entrance Study	A1	1:20	PI
DM 6 13	Block G: Entrance Study	A1	1:20	PI
DM 6 14	Block H: Entrance Study	A1	1:20	PI
DM 6 15	Balcony Study: Type 1 (1500mm Depth)	A1	1:20	PI
DM 6 16	Balcony Study: Type 2 (1750mm Depth)	A1	1:20	PI
DM 6 17	Balcony Study: Type 3 (2000mm Depth)	A1	1:20	PI
DM 6 18	Balcony Study: Type 4 (1750-2000mm Depth)	A1	1:20	PI

FORMER NESTLE FACTORY, HAYES

PLANNING APPLICATION DRAWING LIST

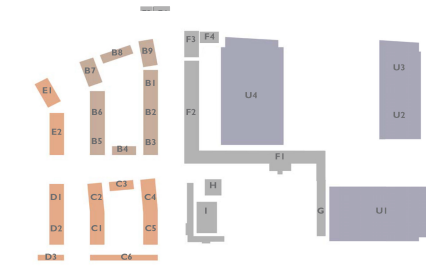
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BLOCK U1, U2, U3 & U4

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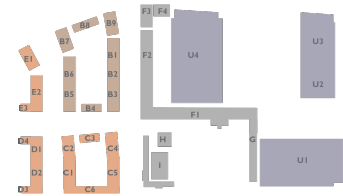
Sheet #	Title	Size	Scale	
MS 0 01	Block U1, U2, U3 & U4: Employment Location Plan	A1	1:1250	PI
MS 0 02	Block U1, U2, U3 & U4: Constraints Plan	A1	1:1000	PI
MS 0 03	Block U1, U2, U3 & U4: Demolition Plan	A0	1:500	PI
MS 1 00	Block U1, U2, U3 & U4: Illustrative Site Layout Plan	A0	1:500	PI
MS 1 01	Block U1, U2, U3 & U4: Site Layout Plan	A0	1:500	PI
MS 2 00	Block U1: Illustrative Elevations	A1	1:200	PI
MS 2 01	Block U2 & U3: Illustrative Elevations	A1	1:200	PI
MS 2 02	Block U4: Illustrative Elevations	A1	1:200	PI
MS 2 03	Block U1: Elevations	A1	1:200	PI
MS 2 04	Block U2 & U3: Elevations	A1	1:200	PI
MS 2 05	Block U4: Elevations	A1	1:200	PI
MS 2 06	Block U4: Demolition Elevation	A1	1:200	PI
MS 4 00	Block U4: Section Through Retained Façade	A1	1:100	PI
MS 4 01	Block U1: Floor plans	A1	1:200	PI
MS 4 02	Block U2: Floor plans	A1	1:200	PI
MS 4 03	Block U3: Floor plans	A1	1:200	PI
MS 4 04	Block U4: Floor plans	A1	1:250	PI
MS 5 00	Block U4: Detailed Section	A1	1:20 & 1:10	PI

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LANDSCAPE

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Sheet #	Title	Size	Scale	
LG 1 01	Landscape Overview Masterplan [Parking - Day one]	A0	1:500	PI
LG 1 02	Landscape Overview Masterplan [Parking - Future provision]	A0	1:500	PI
LG 1 03	Illustrative Landscape Masterplan	A0	1:500	PI
LG 1 04	Landscape Masterplan GA 01 of 04	A0	1:200	PI
LG 1 05	Landscape Masterplan GA 02 of 04	A0	1:200	PI
LG 1 06	Landscape Masterplan GA 03 of 04	A0	1:200	PI
LG 1 07	Landscape Masterplan GA 04 of 04	A0	1:200	PI
LG 3 01	Landscape sections AA - BB	A0	1:100	PI
LG 3 02	Landscape sections CC - DD	A0	1:100	PI
LG 3 03	Landscape sections EE - FF	A0	1:100	PI
LG 3 04	Landscape sections GG - HH	A0	1:100	PI

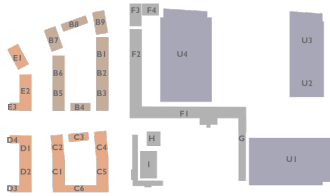
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PLANNING APPLICATION DRAWING LIST

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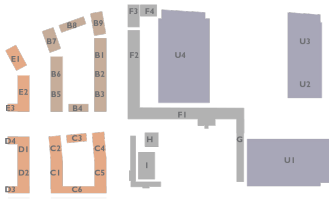
CGIS

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Sheet #	Title	Size	Scale	
MP 8 01	Masterplan: View along Canal Street facing Grand Union Canal	A3	NA	PI
MP 8 02	Masterplan: View along edge of the Canal	A3	NA	PI
MP 8 03	Masterplan: View from Wallis Gardens looking towards Main Fact	A3	NA	PI
MP 8 04	Masterplan: View from Wallis Gardens	A3	NA	PI
MP 8 05	Masterplan: View along Milk Street looking towards Block B	A3	NA	PI
MP 8 06	Masterplan: View along Milk Street looking towards the Block D	A3	NA	PI
MP 8 07	Masterplan: View along Sandow Square looking East	A3	NA	PI
MP 8 08	Masterplan: View along Nestles Avenue looking West	A3	NA	PI
MP 8 09	Masterplan: View from Wallis Garden looking towards the Main F	A3	NA	PI
MP 8 10	Masterplan: View from Wallis Garden	A3	NA	PI
MP 8 11	Masterplan: View along Sandow Square looking West	A3	NA	PI
MP 8 12	Masterplan: View along Canal Street facing Block B	A3	NA	PI
MP 8 13	Masterplan: View along Canal Street facing the Heritage Cluster	A3	NA	PI
MP 8 14	Masterplan: View along the edge of the canal looking towards the	A3	NA	PI
MP 8 15	Masterplan: View along the Trim Trail north of Block B and E	A3	NA	PI
MP 8 16	Masterplan: View along Milk Street looking towards Block B	A3	NA	PI
MP 8 17	Masterplan: View from Block C Courtyard	A3	NA	PI
MP 8 18	Masterplan: View along Nestles Avenue looking West	A3	NA	PI
MA 8 01	Block B facade treatment along East elevation	A3	NA	PI
MA 8 02	Block B balcony types along Sandow Square	A3	NA	PI
MA 8 03	Block B	A3	NA	PI
MA 8 04	Block B elevation along Milk Street	A3	NA	PI
MA 8 05	Block B corner accent balconies	A3	NA	PI
MA 8 06	Block B entry porches along Milk Street	A3	NA	PI
MA 8 07	Block B podium garden view	A3	NA	PI
MA 8 08	Block B podium garden entrance portal from Sandow Square	A3	NA	PI
MA 8 09	Block B podium garden view facing North	A3	NA	PI
MA 8 10	View from Coffee Park looking towards Block B	A3	NA	PI
MA 8 11	Block B balcony types along Canal Street	A3	NA	PI
MA 8 12	Block B double height entrance lobby	A3	NA	PI
MA 8 13	Block B duplex entrances from Sandow Square	A3	NA	PI
HB 7 00	View along Milk Street along D1 and D2	A3	NA	PI
HB 7 01	View towards Block C2 entrance	A3	NA	PI
HB 7 02	Block E1 view from Coffee Park	A3	NA	PI
HB 7 03	Block C4 view from Canal Street and Sandow Square	A3	NA	PI
HB 7 04	Block C podium garden view	A3	NA	PI
HB 7 05	Block C6 view along Nestles Avenue	A3	NA	PI
HB 7 06	View from Block C6 garden space	A3	NA	PI
HB 7 07	Block C3 view from Sandow Square	A3	NA	PI
HB 7 08	Block C2 corner balconies	A3	NA	PI
HB 7 09	Block E1 balcony view from Milk Street	A3	NA	PI

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MAKOWER ARCHITECTS Hawkins\Brown dMFK MICHAEL SPARKS ASSOCIATES

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Sheet #	Title	Size	Scale	
HB 7 10	Block D4 view from Sandow Square	A3	NA	PI
HB 7 11	Block E3 view from Sandow Square	A3	NA	PI
HB 7 12	View of Block C6 Entrance	A3	NA	PI
MS 9 00	Unit 01 and 02 view from Estate Road	A3	NA	PI
MS 9 01	Unit 02 view from Estate Road	A3	NA	PI
MS 9 02	View of Unit 03 from canal	A3	NA	PI
MS 9 03	Unit 04 retained elevation of Truscon Building	A3	NA	PI
MS 9 04	Unit 03 and 04 view from across the canal	A3	NA	PI
MS 9 05	View of canal footpath looking east	A3	NA	PI

APPENDIX 3
EIA SCREENING & SCOPING LETTERS



HILLINGDON

LONDON

Gareth Wilson
Barton Wilmore
7 Soho Square
London
W1B 3DB

29 June 2015

Dear Gareth,

Request for a Screening Opinion under Town & Country Planning (Environmental Impact Assessment) Regulations 2011

DEMOLITION OF EXISTING FACILITIES AND REDEVELOPMENT OF SITE FOR MIXED USED DEVELOPMENT FORMER NESTLE FACTORY, HAYES

Thank you for referring the screening report for the above development. I apologise for the delay in responding.

1.1 Screening Opinion

The proposed works are considered likely to have a significant environmental effect in the context of the Environmental Impact Assessment Regulations 2011. A subsequent planning application for the works **does need** to be accompanied by an Environmental Impact Assessment (EIA).

1.2 Schedule 2 Development

The site covers an area of approximately 12 hectares. Therefore the development falls within Schedule 2 (10b) of the 2011 EIA Regulations as an urban infrastructure project.

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1.2.1 Cumulative Developments

The development needs to be considered in light of the current committed developments in surrounding area. These include several not referenced in the scoping report but which would give rise to significant additional traffic beyond that experienced when the Nestle operations were at their peak.

1.3 Justification for Positive Screening

The Council considers that the proposed works will have a significant adverse effect on the environment in the context of EIA and the criteria set out in Schedule 3 of the Regulations.

In particular the development is likely to have an effect beyond local importance and therefore EIA is considered necessary.

1.3.1 Air Quality and Traffic

The site is within an air quality management area due to current levels of nitrogen dioxide (NO₂). Recent modelling has shown that current concentrations of NO₂ are above the minimum EU Air Quality standards for health (40µg). A map showing the areas in breach is attached as appendix 1.

The current breaches in air quality limits places make the development site and surrounding area highly sensitive to any additional changes. The sensitivity also needs to be considered in light of the recent Supreme Court Judgement on air quality (*R (on the application of ClientEarth) v Secretary of State for the Environment, Food and Rural Affairs [2015] UKSC 28*). Any significant increase in traffic will add to the constraint on Local, Regional and Central Government authorities to constrain the growth in air quality impacts.

The screening report provides little information on the amount of traffic related with the proposed development compared with the existing situation. It also fails to consider the cumulative impacts with several other developments which culminate in a considerable amount of traffic.

The screening report states:

3.17 Current traffic flows at the site are reduced compared to previous years because the Nestle facilities are slowly being decommissioned from their peak. The operational phase of the development would affect traffic movements and increase the number of vehicles using the neighbouring roads, although this should be considered in the context of the existing facility.

The report does not provide any details for the context for determining traffic impacts, but it does conclude:

3.18 Based on initial surveys of the Bulls Bridge Roundabout, it has been identified that highways improvements would be required to allow the development to distribute on to the highway network.

It is therefore implied that the traffic generated for the proposed development cannot be accommodated on the existing road network and that works would be required. The area is extremely sensitive to an additional traffic burden particularly given the extent of cumulative proposals in the area. It is therefore expected that the proposed development would increase the harm to air quality through demolition, construction, and the operational phases of the development.

Schedule 3(2) of the Regulations provides the advice that needs to be considered when determining the applicability of EIA:

The environmental sensitivity of geographical areas likely to be affected by development must be considered, having regard, in particular, to -

(vi) areas in which the environmental quality standards laid down in EU legislation have already been exceeded;

Evidently, the currently failings in EU air quality levels heightens the sensitivity of the site and the concerns regarding the increase in traffic are therefore deemed significant in the context of EIA. Air quality has significant health related problems and given the large surrounding population, the development is deemed likely to have a significant environmental effect.

1.3.2 Ground Conditions

The screening report has not provided information on the quality of the ground conditions but does suggest there is likely to be some high levels of contamination on the site

3.25 A Phase 2 programme of intrusive investigation has identified that the underlying sand and gravel principal aquifer is located in close proximity of the ground surface and is thus vulnerable to contamination. Furthermore, investigations identified that there is quite an extensive area of Made Ground and shallow sub-soil that has contamination linked to historic releases of petroleum hydrocarbons (TPH) in and around areas of old boiler plant and fuel tanks. Further contaminants identified include mercury, arsenic, chromium 6+ and lead. Of these contaminants, mercury was the most widely reported of the trace metals. The site is also known to have a considerable amount of asbestos containing materials within site soil, in particular one relatively localised area (boiler house area).

In lieu of detailed evidence to the contrary, the screening report suggests that the contamination on the site is of a high level and needs further work. The presence of the sensitive aquifer, the location of the sensitive Grand Union Canal and combined with the scale and nature of the development raises significant concerns regarding contamination. Based on a precautionary development the development is therefore likely to have significant effect.

1.3.3 Conservation Site

The development is in a conservation area and therefore of local importance. Schedule 3(2) of Regulations requires consideration to be given to

viii landscapes of historical, cultural or archaeological significance.

The conservation status of the site places the proposal in an area with valued historical and cultural significance although not beyond local importance.

1.3.4 Other Topics

The development is not within **flood** zone 2 or 3 as shown on the latest Environment Agency flood zone maps. It is therefore at a low probability of flooding. It is not considered that the development will significantly increase the risk of flooding.

The site is likely to be of relatively low **ecological** value when considering presence of protected species. The site will have a residual borough level value though, as it borders the Grand Union Canal, a Site of Metropolitan Grade Importance for Nature Conservation.

The Council will expect a full enhancement scheme to be part of the proposals and would not wish to see the site undervalued because of a lack of protected species. The Council would wish to see landscaping with specific ecology benefits and habitat creation (e.g. habitat walls) to be included in the proposed scheme.

The development is likely to have **noise** implications, particularly through demolition and construction but these are not considered to have more than local importance.

1.4 Summary

The principle concerns relate to air quality, traffic and land contamination. With respect to traffic and air quality, the development has to be considered in light of the existing air quality breaches and problems. The development is in close proximity to the new urban village at Southall Gasworks, a large scale mixed used development north of the site, not residential uses to the east, a new tarmac production facility to the east and an improved station at Crossrail that anticipates significant amounts of regeneration. On its own the

air quality issues are considered to be significant due to the acceptance in the screening report that the existing road network cannot accommodate the levels of traffic proposed; however, taken in the context of the neighbouring development, which includes cross boundary Local Authority issues, the likely significance of effects increases.

The contaminated land matters are also of significant concern. The screening report alludes to significant existing problems which requires considerable amount of investigation. Based on the information presented and due to the location of a sensitive water receptor the Council is minded to adopt a precautionary approach and deem the development likely to have a significant effect.

The screening report conclusions rely heavily on statutory designations for the determination of significance. This is overly simplistic and there needs to be more careful consideration of the criteria in Schedule 3(2) when considering sensitivity. Taken these into the context of the principles of the Directive and Regulations, the area surrounding the development is particularly sensitive and warrants further assessment to ensure a high level of environmental protection.

The development falls within the thresholds of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. Using the selection criteria outlined in Schedule 3 of the Regulations the London Borough of Hillingdon does consider that the proposals require EIA.

If you wish to discuss any of the above further, or have any questions, please do not hesitate to contact Ian Thynne using the details at the foot of the first page.

A handwritten signature in black ink that reads "James Rodger". The signature is written in a cursive style with a large, looping initial 'J'.

Head of Planning, Sport and Green Spaces

Date: 29 June 2015.



HILLINGDON

LONDON

Gareth Wilson
Partner, Planning
Barton Willmore
7 Soho Square
London W1D 3QB

Ref: **Nestle/Scoping/IRT**
Date: **13 May 2016**

Dear Gareth

**MIXED USE DEVELOPMENT
REQUEST FOR SCOPING OPINION IN ACCORDANCE THE TOWN AND COUNTRY
PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 (AS
AMENDED 2015)**

Thank you for your request for a Scoping Opinion dated 11 March 2016.

The enclosed Scoping Opinion sets out the Council's initial appraisal of what is required based on the level of information provided.

The Council retains the right to keep the Scoping Opinion under review to ensure the ES can respond to any fundamental changes that require different or other likely significant effects to be assessed in accordance with the regulations.

Further work is required to finalise the scope of the specific studies. The EU guidance on the detail of scoping reports suggest that some preliminary evidence gathering should be included. There is limited detail in relation to transport and air quality. It is accepted that further transport discussions are ongoing, but detailed air quality information would have assisted in specifying the parameters and extent of the air quality study. Further discussions are therefore necessary and should be arranged prior to assessment work being undertaken.

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If you wish to discuss the Scoping Opinion or any of the comments above any further, please do not hesitate to contact me using the details at the foot of the first page.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Thynne', written in a cursive style.

Ian Thynne
Principal Sustainability Officer



HILLINGDON

LONDON

SCOPE OF INFORMATION TO BE INCLUDED WITHIN ENVIRONMENTAL STATEMENT
PART 4, REGULATION 13 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL
IMPACT ASSESSMENT) REGULATIONS 2011 (AS AMENDED 2015)

Proposal:	Mixed Use Development
Location:	Former Nestle Factory, Hayes
Scoping Report:	Prepared by Barton Willmore
Report Dated:	11 March 2016

Environmental Impact Assessment

1. Need for EIA

- 1.1. The proposals do not fall within the thresholds set out in Schedule 1 of the Environmental Impact Assessment (EIA) Regulations (the Regulations) as amended. However, the development does fall within Schedule 2 of the Regulations (Category 10[b]) urban infrastructure projects over 1 hectare or over 150 residential units) and is therefore subject to screening as to whether EIA is appropriate or not.
- 1.2. The Council issued its screening opinion in June 2015 and confirmed that the proposed development was deemed to give rise to likely significant effects.
- 1.3. The following comments assist in determining the scope of the subsequent Environmental Statement (ES) to ensure it considers only likely significant effects, and the proposed mitigation to remedy them.

General Scoping Comments

2. Introduction

- 2.1. The scoping stage for the environmental statement (ES) is a valuable tool in helping the applicant to form an agreement with the Council about how environmental data will be collected and assessed. It helps to remove possible conflict once a planning application is submitted.
- 2.2. The scoping stage allows an agreed approach to identifying a baseline environmental position against which effects will be assessed as well as setting out a methodology for identifying impacts and receptors.
- 2.3. The importance of scoping is further increased as the ES does not provide the decision on a planning application, instead it provides a tool for assisting in the decision making process. Therefore the assessment should set out a factual analysis of the effects of the development. The scoping stage provides the opportunity to refine this assessment framework and measurement of effects.
- 2.4. Effects are a measurement of the development's impacts on a range of receptors. These are assessed using the criteria set out in Schedule 4 of the EIA Regulations. The scoping stage provides the opportunity for the developer to clearly set out the likely impacts of the development. These are then considered in the context of the receptors, some of which are known to the Local Authority (e.g. air quality levels) and some of which would need to be provided by the applicant using more specific assessments (e.g. on site ecology).
- 2.5. The submitted ES is then formed around these factual representations of the impacts and receptors, making it obvious how opinions on effects have been developed.

3. Development Description

- 3.1. The development description suitably describes the project to be carried whilst recognises a subsequent application would be only at 'outline' stage.
- 3.2. The project description set out in the ES will need to set out the specific maximum parameters for possible future development.

4. Baseline Information

- 4.1. One of the main roles of the Scoping stage is to establish the existing baseline environmental position i.e. the amount of current traffic movements, existing noise

levels, likely impacts on air quality etc... However, the report submitted does not contain information on the current baseline. The EU Scoping guidance states:

For example, in almost every case, some initial baseline studies (e.g. desktop research) will be required before or as part of the scoping exercise, in order to highlight the main or likely significant effects (the prime purpose of scoping).

4.2. The Council holds broad environmental information but this is not normally at the relevant site specific level. It is therefore normal for baseline studies to be completed to determine the existing environmental baseline. This then allows an agreed approach to the methodology for assessing how the proposed development will change the existing baseline.

4.3. Further discussions should be carried out and ideally the baseline formally agreed prior to submission of the application.

5. Significant Effects

5.1. A Scoping Report should provide an outline of the methodology to be used to assess the significance of effects. The significance of effect is dependent on the scale of impact and the sensitivity of the receptor. The Scoping Report should set out the weighting attributed to both and in turn how significance is determined.

5.2. Commonly, impacts are measured in terms substantial, high, moderate, low or negligible. These impacts can be either positive or negative. Receptors are normally defined as international, national, regional, borough or local.

5.3. Each ES topic area will need to be applied to the preferred methodology to determine how the scale of effects will be assessed. This is normally dependent on the baseline position. For example, if the baseline assessment shows air quality levels to be above 40ugm³ (EU minimum standard) then the magnitude of impact of the development would be different to the same development located in an area with a baseline of considerably less 40ugm³. It is therefore important to establish the baseline and how the methodology relates to each topic area. This work should be completed prior to commencement of the ES.

6. Cumulative Impacts

6.1. The ES will need to consider cumulative impacts with other developments either built, being built or committed (defined as an application submitted but waiting approval, or an approved scheme). The only likely cumulative impacts from major development

relate to transport matters. These will need to be agreed as part of the transport assessment process.

7. 'Scoped Out' Topics

7.1. Modern approaches to planning require considerable amounts of information to be submitted with an application. There will still be a need to satisfy planning requirements regardless of whether an impact is considered to be significant or not in the context of the ES. For ease of reference, these 'scoped out' topics should still be included within ES chapters or as reports attached in appendices; however it should be acknowledged that these will not need to be 'tested' in the same manner as those impacts with likely significant effects.

8. Consultation Responses

8.1. The Council carried out a consultation with statutory consultees as required by the Regulation. Not all consultees replied, but the responses from those that did are included in appendix 1.

Environmental Topics - 'Scoped In'

9. Summary of Topics

9.1. The following topics are scoped in for greater assessment in the Environmental Statement:

- Traffic and Transport
- Air Quality
- Contamination and Ground Conditions

10. Traffic and Transport

10.1. One of the key issues of the development relates traffic and transport. The area surrounding and supporting the development site is heavily urbanised with limited arterial routes (regional level receptor) to the strategic network. Consequently the area suffers from significant levels of congestion with or without a fully operational Nestle factory.

10.2. The development will result in an amount of traffic that it likely to result in further significant effects to the road network. These effects are likely to be of more than local importance.

10.3. The applicant has already commenced work on the scope of traffic assessment. This traffic assessment has to inform a specific chapter in the subsequent Environmental Statement. The ES should not just replicate the conclusions from the traffic assessment, but instead make a detailed assessment of the effects and consequences across the road network (not just at junctions) and identify and describe the necessary mitigation to reduce such effects.

Highways England Response

10.4. Included within Appendix 1 is a response from Highways England. They have confirmed that they consider the development to have a likely significant effect on the strategic road network.

10.5. This approach is not consistent with that taken by Highways England at a Development Consent Order Hearing into a proposal to convert the M4 motorway into a 'SMART motorway'.

10.6. During this hearing, Highways England confirmed that there would be no significant effects on junctions 3 and 4 of the M4 as a consequence of their scheme. Highways England confirmed, and gave evidence that this conclusion was reached with allowance for the cumulative effects from a range of other developments, including the Nestle Site.

10.7. In light of this evidence, written and oral, Highways England deemed there to be no need for mitigation on the supporting junctions as there were no significant effects identified.

10.8. It therefore follows that these proposals for the Nestle Site are unlikely to have a significant effect on the strategic network. The impacts on the strategic network (Junctions 3 and 4 of the M4 in particular) can be scoped out of the Environmental Statement.

10.9. Notwithstanding the above, the subsequent transport assessment must consider all the impacts, likely to be significant or otherwise, of the scheme relevant to planning policies and local decision making.

11. Air Quality

11.1. The road network that supports the development site is currently the predominant source for breaches in minimum EU limit values for air quality. The Council has an air quality monitoring station on the junction of the Parkway (A312) and West Hyde

Gardens. The data for this station (Hayes Harlington) can be found at <http://www.heathrowairwatch.org.uk/data/statistics>

- 11.2. The data shows a consistent breach of limit values (40ugm). The average annual mean for 2015 was 46ugm, in 2014 it was 53ugm and in 2013 it was 47ugm. These are high levels of air quality with serious impacts.
- 11.3. In each of these years the Nestle factory was not in operation or was significantly winding down. The proposed development would increase traffic in a congested area resulting in longer queues and further air pollution. The capacity of the environment in this location to accommodate further increase in air quality pollution is zero.
- 11.4. The Council therefore considers that the air quality impacts associated with the traffic from the development needs to be scoped into the environmental statement.
- 11.5. In the first instance baseline data should be taken from the Hayes Harlington automatic monitoring station. Beyond that, further discussions are required to understand the scope of the air quality assessment in more detail. The Scoping Report should have contained the initial surveys and data on air quality i.e. baseline assessment years, agreement about emission factors for vehicles etc... Further discussions are therefore necessary to identify the specifics of the study to ensure the likely significant effects are properly reported.

Methodology

- 11.6. The Scoping Report does not set out the methodology for assessing (or 'scoring') the air quality impacts and determining the effects. The Council would expect the health impacts to be fully explored as these form part of the likely significant effect and all relevant receptors should be identified and those particularly sensitive e.g. residential units, schools, nurseries etc... should be set out clearly.
- 11.7. The specific 'scoring' methodology also needs to be agreed. The Council considers that any increase in air pollution should be described as high and therefore a significant effect. It is important to note that a significant environmental effect should not automatically result in a refusal. It should be a matter for identifying mitigation that is appropriate and tailored to the effect identified.
- 11.8. Further discussions are required to finalise the specific air quality assessment methodology.

12. Contamination

12.1. The history of the site presents a potential concern regarding contamination. The ES should fully consider the potential effects to and from contamination on:

- Ground conditions
- Human Health
- Controlled waters (including above ground watercourses and below ground aquifers)

12.2. The Environment Agency has responded to the scoping consultation and confirmed there are likely significant effects from contamination.

13. Cumulative Impacts

13.1. The Council set out the other developments to be included within the cumulative assessment. The cumulative impacts on traffic and air quality must be included within the environmental statement.

Environmental Topics - 'Scoped Out'

14. Socio Economic

14.1. The Council agrees that the likely socio-economic effects are not likely to be significant. The Nestle factory, which at one time would have been a significant employer, was wound down some time ago. The baseline position is therefore not one of a significant change from the existing scenario.

15. Landscape, Townscape and Visual Effects

15.1. The area is currently extensively developed with industrial buildings. Whilst the site is a conservation area, it does not hold any designations of more than local status. The development will have a visual impact but it is not considered significant in the context of this heavily urbanised area.

15.2. Furthermore, Highways England has determined that the height of the proposed development (12 stories) is unlikely to have a visual impact on heritage assets (Grade 2 Listed Buildings).

16. Built Heritage and Archaeology

16.1. The site includes locally listed buildings. The heritage impacts will be a key factor in the decision making but in the context of EIA the development is not considered to have an impact beyond local importance.

16.2. Historic England provided responses to the consultation covering archaeology and built heritage. Historic England did not support the conclusions made in the Desk Based Assessment included within the Scoping Report but did not identify a likely significant effect. Further information is required for the planning application but this topic can be scoped out of the ES.

16.3. Similarly, Historic England provided concerns about the demolition of a large expanse of buildings within the Botwell, Nestles, Hayes Conservation Area. The Council agrees that the impacts need to be sensitively considered within the planning application, but as set out above, the impacts would not be more than of local importance and therefore not significant.

17. Noise and Vibration

17.1. A standard noise assessment will be required for the development. A suitable baseline will need to be agreed, and how effects assessed should be agreed. The development is not likely to have a significant effect.

18. Flood and Water Management

18.1. The site is shown to be in Flood Zone 1 and therefore at a low probability of flooding. A Flood Risk Assessment will be required as part of the planning application which will need to demonstrate a reduction in surface water run-off.

18.2. In addition, the Flood Risk strategy should be widened to consider the whole water cycle. This should link flood risk to water attenuation and reuse. The site is in a severely water stressed area where water demand is projected to outstrip supply within the near future. Accordingly, a water strategy should be able to demonstrate how the development can cope in a flood without increasing the risk to others; how water consumption will be reduced; and how water can be stored and reused on site.

19. Ecology

19.1. The Council understands that preliminary ecological information has been produced. The details of this report have not been disclosed.

19.2. Notwithstanding the above, the site is heavily urbanised with little obvious ecological value.

19.3. Given the lack of ecological value in the area, this topic can be scoped out.

19.4. The Phase 1 assessment should be appended to the ES as a stand alone technical report complete with recommendations for biodiversity enhancements. This could include

onsite considerations, such as green roofs (which will be expected on parts of the development) and living walls.

20. Demolition

- 20.1. Recent case law on EIA requires demolition to be considered in the context of EIA.
- 20.2. The heritage nature of the site is sensitive. The demolition will therefore include buildings of historic significance. The scale of the demolition and the quantity and value of buildings to be lost does not result in likely significant effect in the context of EIA.

21. Planning Application Process

- 21.1. Regardless of the requirement for EIA, standard planning protocols will apply. This means information not detailed above may be required to be submitted with the application. You are advised to contact the Planning department to confirm other planning requirements.

22. Construction and Operation Impacts

- 22.1. The ES should also consider the effects of construction and operation on the surrounding area. These should be set out in the topic areas mentioned above.

A handwritten signature in black ink that reads "James Rodger". The signature is written in a cursive style with a large, looping initial 'J'.

Head of Planning

Date: 16 May 2016

**APPENDIX 4
PLANNING HISTORY**

**Nestle Factory Site
Planning History**

Reference	Proposal	Received	Status	Use Class
1331/APP/2016/1 155	Request for Screening Opinion	16-03-16	Confirmed 13-05.16	Potentially B1 (c), B2, B8, C3, D2, A1, A2, A3, A4
1331/APP/2014/4 193	Installation of temporary security fencing and installation of anti-climb spikes on existing fencing	26-11-14	Approval	N/A
1331/APP/2004/3 247	Demolition of packing material warehouse building (application for conservation area consent)	15-11-04	Refusal (P)	N/A
1331/APP/2003/1 430	Installation of a 40 metre high exhaust chimney	11-06-03	Approval	N/A
1331/APP/2003/1 111	Demolition of concrete canopy to rear of coffee building together with corrugated metal roofing (application for conservation area consent)	07-05-03	Approval	N/A
1331/APP/2003/9 43	Demolition of F.I.S building (application for conservation area consent)	18-03-03	Approval	N/A
1331/APP/2003/9 45	Demolition of packing and materials warehouse and amenities building (application for conservation area consent)	18-03-03	Appealed	N/A
1331/APP/2003/4 90	Erection of two storey high staircase and enclosure to front facade of existing three storey building with demolition of existing pedestrian bridge between amenities and office building	28-02-03	Approval	N/A
1331/APP/2003/4 95	Removal of access bridge (application for conservation area consent)	28-02-03	Approval	N/A
1331/APP/2002/2 993	Demolition of redundant boiler house to concrete slab level (application for conservation area consent)	20-12-02	Approval	N/A
1331/APP/2000/1 618	Demolition of reinforced concrete canopy (application for conservation area consent)	10-07-00	Refusal (p)	N/A
1331/APP/2000/1 284	Erection of an extension to chemical store and erection of	26-05-00	Approval	B8

	covered chemical storage shelter			
1331/APP/2000/912	Erection of a steel framed enclosure and removal of four cooling towers and pond	12-04-00	Approval	B8
1331/FW/99/1812	Erection of a three storey infill extension, enlargement of existing roof enclosure, erection of two equipment platforms on northside flat roof, and two on east elevation	24-08-99	Approval	B2/B8
1331/FP/99/0161	Erection of a single storey electrical control room on roof	27-01-99	Approval	Ancillary
1331/FM/98/2103	Redevelopment to form extension to existing car park (involving demolition of office and outbuildings)	28-10-98	Refusal (p)	N/A
1331/FN/98/2049	Demolition of office and outbuildings (Application for Conservation Area Consent)	19-10-98	Refusal (p)	N/A
1331/FH/98/1258	Erection of a cooler house extension	15-06-98	Approval	B2
1331/FG/97/1691	Details of landscaping scheme, fencing and materials in compliance with conditions 2,3,4,5 and 6 of planning permission ref.1331EW/97/72 dated 14/05/97; Erection of new security building, factory shop, formation of new access and extension to car park	10-10-97	Approval	B1/A1
1331/FF/97/1595	Erection of fifteen 8 metre high lighting columns and 2 Close Circuit TV Towers to serve car park and site entrance	30-09-97	Approval	N/A
1331/FE/97/1140	Demolition of redundant boiler house and associated plant and equipment (Application for Conservation Area Consent)	14-07-97	Approval	N/A
1331/FC/97/1037	Redevelopment to form extension to existing car park (involving demolition of office and outbuildings)	14-07-97	Refusal (p)	N/A
1331/FD/97/1038	Demolition of office and outbuildings (Application for Conservation Area Consent)	04-07-97	Refusal (p)	N/A
1331/EY/97/0121	Details of landscaping scheme in compliance with condition 5 of planning permission	23-01-97	Approval	B8

	ref.1331EE/95/ 225 dated 28/12/95; Erection of a warehouse distribution centre and alterations to external elevations			
1331/EW/97/0072	Erection of a new security building, factory shop, formation of new site access and extension to car park and erection of a security fence with associated landscaping (involving demolition of existing security building, garage and workshop)	20-01-97	Approval	A1, B1, B2, B8
1331/EW/97/0073	Demolition of security building, workshop and garage (Application for Conservation Area Consent)	20-01-97	Approval	N/A
1331/ET/96/1583	Demolition of a second floor cantilevered extension (Application for Conservation Area Consent)	18-10-96	Approval	N/A
1331/EP/96/1152	Erection of a new loading bay together with alterations to the north elevation (retrospective application)	29-07-96	Approval	N/A
1331/EM/96/1144	Installation of a tanker loading bay	26-07-96	Approval	N/A
1331/EM/96/1027	Erection of a 3 metre high extension to roof of finished goods warehouse to house plant equipment	05-07-96	Approval	N/A
1331/EJ/96/0660	Erection of single storey and first floor extensions to existing warehouse to form coffee bin storage and handling and packaging facility	29-04-96	Withdrawn (p)	N/A
1331/EH/96/0464	Erection of two 18.5 metre high silos	25-03-96	Approval	B8
1331/EE/95/0225	Erection of a warehouse distribution centre and alterations to external elevations	14-02-95	Approval	B8
1331/ED/94/0694	Conversion of social club bar and ancillary areas to occupational health and fitness room (Application for a Certificate of Lawfulness for a proposed use or development)	26-04-94	General Perm.Devt	D1

1331/EB/94/0532	Erection of a three-storey external fire escape staircase	30-03-94	Approval	N/A
1331/EA/94/0309	Erection of a factory extension	24-02-94	Approval	B1/B2
1331/DZ/93/1773	Erection of a three-storey extension to existing coffee extraction plant	02-11-93	Refusal (P)	B1/B2
1331/DX/93/1661	Details of materials and finishes in compliance with condition 2 of planning permission ref. 1331DR/92/2133 dated 7.5.93 and condition 4 of Conservation Area Consent ref.1331DP/92/2131 dated 7.5.93; Partial demolition of food processing factory and erection of a waste coffee grounds combustion plant	11-10-93	Approval	B1/B2
1331/DY/93/1663	Erection of a waste coffee grounds combustion plant chimney	11-10-93	Approval	B1/B2
1331/DP/92/2131	Partial demolition of food processing plant (Application for Conservation Area Consent)	22-12-92	Approval	N/A
1331/DR/92/2133	Erection of a waste coffee grounds combustion plant	22-12-92	Approval	B1/B2
1331/DN/92/1850	Erection of a storage silo	03-11-92	Approval	B8
1331/DK/92/1675	Erection of a three storey extension to existing coffee extraction plant	01-10-92	Approval	B1/B2
1331/DH/92/3572	Installation of three internally illuminated plinth mounted signs	07-08-92	Approval	N/A
1331/DD/92/0234	Erection of extension on top of existing building to house plant room	12-02-92	Approval	B1/B2
1331/DE/92/0236	Demolition of part of existing roof and erection of a small extension on top of existing building to house plant room (Application for Conservation Area Consent)	12-02-92	No Further Action(P)	N/A
1331/CZ/90/1404	Installation of a plant room at roof level to third floor of building	09-08-90	Approval	B1/B2
1331/CY/90/1184	Erection of a steel framed open sided canopy	02-07-90	Approval	N/A

1331/CX/90/0862	Erection of a single storey building for storage of chemicals	09-05-90	Approval	B8
1331/CR/89/0891	Installation of two sugar silos	17-04-89	Approval	B8
1331/CP/89/0075	Erection of two storey building with mezzanine floor for coffee roasters linked by pedestrian bridge to existing building	12-01-89	Approval	B1/B2/B8
1331/CM/88/3144	Installation of 2 company name signs (non-illuminated)	24-10-88	Approval	N/A
1331/CK/88/0434	Change of use from existing company residential use to use as office and storage space	04-03-88	Approval	B1/B8
1331/CL/88/0435	Removal of old storage tanks and erection of nitrogen storage tank on same site	04-03-88	Approval	B8
1331/CJ/87/2272	Erection of cooling tower on roof of "R" plant	19-11-87	Approval	?
1331/BZ/85/0526	Change of use of nursery to car park extension	27-03-85	Approval	N/A
1331/BY/85/0423	Erection of extension to existing cold store	12-03-85	Approval	B8
1331/BR/83/1072	Erection of external lift shaft	13-07-83	Approval	N/A
1331/BP/83/0297	Erection of a canopy. Also relaxation	03-03-83	Approval	N/A
1331/BG/82/0749	Erection of a two storey security office building	28-05-82	Approval	B1
1331/BB/81/0479	Extension at first floor level for use as toilets. Also relaxation	16-03-81	Approval	N/A
1331/AZ/77/1489	Extension to extraction and roasting departments. Also relaxation	31-10-77	Approval	N/A

**APPENDIX 5
LOCAL PLAN REPRESENTATIONS**

BRISTOL
CAMBRIDGE
CARDIFF
EBBSFLEET
EDINBURGH
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOLIHULL

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Planning Policy
London Borough of Hillingdon
3N/02 Civic Centre
Uxbridge High Street
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UB8 1UW

24552/A3/DO/RM

8 December 2015

BY POST & EMAIL: localplan@hillingdon.gov.uk

Dear Sir/Madam

**LB Hillingdon Local Plan Part 2 – Revised Proposed Submission Version
Development Management Policies and Site Allocations and Designations
Comments on Behalf of Barratt London and SEGRO PLC**

1. We write on behalf of SEGRO and Barratt London (BL), to provide comments on the current LB Hillingdon Local Plan Part 2 Development Management Policies and Site Allocations and Designations consultation.

Background

2. In 2012, Nestlé announced the planned closure of the Hayes plant and the transfer of the whole of its UK coffee operation, including manufacturing, filling and packing to Tutbury in Derbyshire, where a new manufacturing facility has been built to provide the flexibility in production that the UK requires.
3. SEGRO purchased the factory site from Nestlé earlier this year and it has since sought a development partner to deliver residential uses alongside its own commercial development as part of the redevelopment of the former Nestlé factory site. BL has been selected as development partner and is working with SEGRO to deliver a comprehensive site wide masterplan, which seeks to deliver new homes and employment for the Borough together with other benefits, including enhanced open space and respecting the history of the site.
4. Pre-application discussions have been held with LB Hillingdon over a number of months and the proposed masterplan for the site's redevelopment has been presented to officers. Detailed discussions have subsequently taken place on the emerging scheme, including on the quantum of development and proposed land uses. The scheme proposals have been well received by the Council and, based on discussions held to date, the proposed masterplan reflects the Council's aspirations for the site. It is intended that a planning application will be submitted in 2016.



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5. This site is complex because of its history, constraints, heritage, and opportunities. It is uncertain yet what the optimal approach for the redevelopment of the site might be as there are many different potential outcomes. In such circumstances, the objective of policy should, in our view, be to provide:
 - a. the LPA with a strong basis for determining planning applications and securing key objectives for the site the LPA desires and can justify;
 - b. clarity for applicants and third parties to understand what is required and how applications will be judged; and
 - c. all parties with sufficient flexibility to enable evolution of design to occur without policy stifling what might otherwise be considered good outcomes.
6. Our comments below are therefore made in the context of our emerging masterplan proposals to redevelop the entire former Nestlé factory site.

Site Allocation Policy SA5 – Land to the South of the Railway, Including Nestlé Site

7. SEGRO and BL support the identification of land at Nestles Avenue for development in the Site Allocations and Designations Local Plan Part 2 (Revised Proposed Submission Version, October 2015) (Policy SA 5, "Site A") for mixed use residential and employment purposes.
8. The site is a key strategic site, which has been identified to be delivered to assist with the provision of new homes in the Borough. Site A can deliver the Council's aspirations in terms of mixed-use employment and residential uses and is in a more sustainable location compared to other sites given its close proximity to Hayes town centre and existing transport infrastructure. The aim of policy on a strategic site should be to optimise housing output in line with the London Plan and good design.
9. Whilst this is supported, SEGRO and BL are concerned about the way in which policy and supporting text is proposed to be worded, specifically the lack of preciseness and the lack of needed definitions to interpret the policy as intended. In identifying our areas of concern we also provide some suggested replacement text to address the concerns.

Extent of Site A

10. The proposed division between Site A and B is inaccurate. The Plan should reflect the land interest as per the plan enclosed with this letter.

Comprehensiveness

11. Whilst the desire to see sites A, B and C be brought forward together comprehensively is appreciated, the reality is that the sites are owned by different organisations and individuals. We are of the view that there is no overwhelming reason why an acceptable redevelopment cannot be achieved for the sites independently and on different timescales as this often happens with larger sites. Policy and development control decisions require back to back coordination, but this can be achieved. Approached carefully, the Council can ensure that the sites can be brought back into active and beneficial use as soon as possible. The policy should reflect practicalities whilst at the same time safeguarding key outcomes it would like to see that might cross over more than one site or landownership.
12. Whilst comprehensive redevelopment maybe be preferable for all of the allocated sites, it should not be a requirement of the land use policy as this could potentially delay any development, particularly as Site A will come forward in 2016, which is far sooner than the

timescales proposed in the accompanying Regulation 19 Statement, which states that it does not anticipate the site coming forward within the next five years.

Residential Capacity

13. The Policy, as currently worded, states that up to 500 new residential units should be provided on site. The present wording of the policy would mean that where a higher number is proposed it would be contrary to policy. The ultimate capacity of the site will be dependent on many factors, including the approach taken to the amount of employment land to be retained and the approach to retention of existing buildings and structures on site. Given the proximity of existing transport infrastructure, the opening of Crossrail (which will increase the PTAL rating of the site), the revised additional dwellings target the Further Alterations to the London Plan identifies for LB Hillingdon and the opportunity to maximise density through good design, we are of the view that the current identified residential capacity on site could be increased.
14. The evolving masterplan for the site indicates that significantly more than 500 dwellings can be developed in an acceptable manner – our architects have shown that around 1,200 dwellings can be accommodated and this number could be comfortably exceeded without detracting from the overall quality of the proposals. We consider it would be beneficial to the objective of seeing the site redeveloped for maximum community benefit to consider re-wording the policy to provide more flexibility.

Open Space and Sports Pitch

15. The draft policy makes reference to the requirement to provide a sports pitch. No definition of this is provided. In addition, there would not appear to be an evidenced need for the sports pitch requirement.
16. The existing site has a number of assets that could be enhanced for the benefit of the community that relate to open space use. These include the canal side areas and the existing main area of open space in front on the main entrance to the historic building. Rather than requiring a formal sport pitch provision, for which no evidence appears to be provided, we consider a more flexible approach would be beneficial. This could be to set out a required minimum amount of open space that the site must include, and the requirement to provide community wide access to the site. How the required open space is used can evolve from the masterplan design and community engagement and be secured via planning condition.

Education and Community Facilities

17. There is no requirement for a primary or secondary school on the site. This was confirmed by officers in a meeting with SEGRO/BL on 4 December 2015. The reference to education use should therefore be deleted.

Revision of Policy Wording

18. With the above comments in mind, SEGRO and BL propose that Policy SA5 Should be re-worded as follows:

"POLICY SA5 – Land to the South of the Railway, including Nestlé Site

This is an important strategic site for Hayes town and the Borough as a whole. The Council will support proposals that meet the following criteria.

Site A

1. *A heritage assessment should accompany any planning application to support the approach being proposed for the retention, reuse, or removal of Locally Listed structures on the site.*
2. *A minimum of 20% of the site (2.4ha) is to be used for employment generating uses. Suitable uses will include Class B1 and elements of Class B2 and other employment generating uses that are compatible with the residential element of the schemes and the surrounding existing residential area,*
3. *A minimum of 10% of the site should be retained as open space. The open space area providing the setting for the existing driveway leading off of Nestles Avenue to the existing main entrance to the main building, shall be retained and provided as informal public open space for the enjoyment of residents within and beyond the redevelopment.*
4. *The provision of circa 850 – 1,200 residential units, subject to meeting required policy on design and layout standards of buildings and open spaces, the approach taken to retention of existing buildings and structures, the amount of employment floorspace provided, and an acceptable approach on all other policy requirements. The ultimate number of dwellings acceptable on the site will principally be determined by the acceptance or otherwise of the detail of the scheme proposed.*
5. *Small scale retail (less than a total of 1,000 sqm GEA), small scale leisure, and other community uses, such as a nursery, that support the residential and business activities proposed for the site will be encouraged.*
6. *Proposals should include measures to enhance the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network.*
7. *Proposals should include high quality design that integrates the Grand Union Canal, ensures canal-side improvements and makes use of the canal's recreational potential.*

Sites A, B and C

1. *Whilst it is a preference of the Council to see the sites A, B and C come forward together in a comprehensive manner and at the same time, it is acknowledged that the sites may be brought forward through the planning application system independently at the same or at different times. Whichever approach occurs, each application will be required to demonstrate how it achieves or does not frustrate the following principles:*
 - a. *Reflects and maintains the significance of the heritage of the overall site;*
 - b. *Provision of pedestrian links through the sites connecting to Hayes Town Centre and key transport nodes;*
 - c. *Does not unacceptably restrict the development potential of adjoining sites through the location and height of buildings or uses proposed; and*
 - d. *Suitably reflects the Council's latest evidence of housing need in terms of the type and tenure of residential units."*

Development Management Policies – Revised Proposed Submission Version, October 2015

19. We have reviewed the draft policies in the Development Management Policies document. There are a number of matters that we wish to raise, relating to the following policies:

1. Policy DME1: Employment Uses in Designated Employment Sites;
2. Policy DMH2 Housing Mix;
3. Policy DMH7 Provision of Affordable Housing;
4. Policy DMHB3: Locally Listed Buildings;
5. Policy DMHB4: Conservation Areas;
6. Policy DMHB16: Housing Standards;
7. Policy DMHB17: Residential Density;
8. Policy DMHB18: Private Outdoor Amenity Space;
9. Policy DMEI8: Waterside Development;
10. Policy DMCI5: Children's Play Areas;
11. Policy DMT6: Vehicle Parking and Parking Standards set out in Appendix A.

National Planning Policy Framework (March 2012)

20. Paragraph 182 of the National Planning Policy Framework March 2012 (NPPF) identifies the 'tests' for examining local plans. Paragraph 182 also identifies that the role of the independent inspector is to assess whether a plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound.

21. To be considered sound, the NPPF (para 182) states that a local plan should be:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with National Policy.

22. Please find our comments set out below.

Policy DME1: Employment Uses in Designated Employment Sites

23. Section D of the emerging policy states that other uses will be acceptable in LSIS and LSES only where:

- There is no realistic prospect of the land being used for industrial or warehousing purposes in the future;
- Sites have been vacant and consistently marketed for a period of 2 years; and
- The proposed alternative use does not conflict with the policies and objectives of this plan.

24. Paragraph 22 of the NPPF seeks to avoid the long-term protection of employment sites where there is no reasonable prospect of the site being used for that purpose. Paragraph 22 encourages local planning authorities to consider alternative uses of land or buildings on their merits having regard to market signals and the need for different land uses to support sustainable local communities. Having to market a vacant site consistently for a period of 2 years is excessive and contrary to the NPPF. The second bullet point relating to marketing should therefore be removed.

Policy DMH2: Housing Mix

25. The emerging policy 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 table in supporting paragraphs identifies the current housing types and sizes for different types of tenure. However, express reference should be made that the mix will be applied on a site by site basis and the character and nature of the site and scheme will be taken into account.

Policy DMH7: Provision of Affordable Housing

26. We note the policy states a minimum of 35 percent of all new homes must be affordable with a tenure split of 70 percent social / affordable rent and 30 percent intermediate. The flexibility to adjust quantum and tenure to reflect site circumstances (site location and scheme characteristics as well as viability) is essential. Policy wording should be changed.

Policy DMHB3: Locally Listed Buildings

27. The Policy states that extensions and alterations to locally listed buildings will be expected to preserve their local identify and character, and be of appropriate design, scale and materials.
28. In assessing the significance of various buildings consideration should be given to the measures contained within the NPPF – namely whether their loss would result in no harm, less than substantial harm or substantial harm (Section 12).
29. In determining planning applications, local planning authorities should take account of Paragraph 131 of the NPPF:
- "The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness."
30. There are provisions within the NPPF, Paragraph 133, which facilitate a total loss or substantial harm to a heritage asset, provided the requirements of that Paragraph are met and demonstrated in full:
- "Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- The nature of the heritage asset prevents all reasonable uses of the site;
 - No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - The harm or loss is outweighed by the benefit of bringing the site back into use."

31. The policy should therefore reflect that a locally listed building can be demolished where tests set out in Paragraph 133 of the NPPF can be met.

Policy DMHB4: Conservation Areas

32. Emerging policy states that new development within a conservation area will be expected to preserve or enhance its significance by making a positive contribution to its character and appearance. As is the case for draft policy DMHB5, policy DMHB6 should reflect Paragraph 133 of the NPPF, as set out above, to provide more flexibility when considering comprehensive redevelopment, such as that proposed at the former Nestle site.

Policy DMHB16: Housing Standards

33. Table 5.1: Minimum floorspace standards sets out the Council's proposed housing standards. Having assessed these standards against the Mayoral Housing Supplementary Planning Guidance (SPG) (November 2012), we note that these accord. In addition, we note that all homes must meet 'Lifetime Homes Standards', provide at least 10 percent of new housing as accessible or easily adaptable for wheelchair users and support the 'Building for Life' design principles. These proposed standards also accord with the Mayoral Housing SPG (November 2012). This policy must be flexible to take into account changes in national standards.

Policy DMHB17: Residential Density

34. The NPPF highlights the importance of achieving high quality design and inclusive environments. Policy 3.4 and 3.5 of the London Plan seek residential densities that optimise the housing output of sites whilst ensuring that they are of the highest quality internally and externally.
35. It is important to note that residential density is a useful guide to the nature and intensity of a development but cannot be used as the only indicator of acceptability of proposals.
36. Whilst we note that LB Hillingdon seeks to categorise locations, the PTAL rating is key when establishing suitable densities in a location. PTAL provides flexibility and allows for future changes in local circumstances, i.e. Crossrail. The column referring to different locations should therefore be removed. Furthermore, there is no justification for a deviation from the London Plan density matrix (Table 3.2). Policy DMHB20 should therefore refer to the density matrix as set out in the London Plan.

Policy DMHB18: Private Outdoor Amenity Space

37. We note that proposed private outdoor amenity space standards are set out in Table 5.2: Private Outdoor Amenity Space Standards. In summary, emerging standards are as follows:
- 1 bedroom house: 40 sqm;
 - 2/ 3 bedroom house: 60 sqm;
 - 4+ bedroom house: 100 sqm;
 - Studio 1 bedroom flat: 20 sqm;
 - 2 bedroom flat: 25 sqm; and
 - 3+ bedrooms flat: 30 sqm.
38. The Mayoral Housing SPG (adopted November 2012) sets out the following planning policy in relation to amenity space provision:

"A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant."

39. The proposed standards significantly exceed the Mayoral Housing SPG. The LB Hillingdon Open Space Strategy 2011-2026, which comprises part of the Local Plan evidence base, states that: "overall at a Borough wide level the amount of open space is about right" (section 3.2.1, page 18). Although some wards within Hillingdon have open space deficiencies, others do not.
40. Residential developments differ in terms of local circumstances and the character and nature of the site and scheme. To ensure housing sites can be "optimised" (London Plan Policy 3.4), whilst achieving high quality design, LB Hillingdon should seek to bring forward new developments in accordance with the Mayoral private outdoor amenity space standards as set out above.
41. Policy should be amended to reflect the London Plan. There are no LB Hillingdon special circumstances that warrant different standards.

Policy DMEI8: Waterside Development

42. We note that any development located in or adjacent to watercourses should enhance the waterside environment, by demonstrating a high quality design which respects the historic significance of the canal and character of the waterway, and provides access and improved amenity to the waterfront.

Policy DMCI5: Children's Play Areas

43. Emerging policies relating to children's playspace provision are repeated. Policy DMCI5 should be incorporated into policy DMHB21.
44. For all major development proposals, the Council seeks to apply its own child yields and the London Plan SPG entitled 'Providing for Children and Young People's Play and Informal Recreation'. In areas of deficiency, the policy states that there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.
45. The Policy should be amended to make reference to London Plan child yield calculations. There is no justification for deviation. Any policy referring to children's playspace provision should adopt a flexible approach. Taking into consideration the nature of the site, it may be appropriate to provide playspace on site or make a financial contribution to existing facilities in the nearby area. New residential developments should meet the playspace requirements for the new development alone and not the existing deficit.

Policy DMT6: Vehicle Parking and Parking Standards

46. Parking standards as set out in Appendix A are:
 - B1(b) (c): 1 space per 250 sqm;
 - B2 –B8: 1 space per 500 sqm;
 - Dwellings with curtilage: 1 space per 1 or 2 bed units and 2 spaces per 3 or more bed units;
 - 3-4 or more bedroom flats: 2 spaces per unit;
 - 1-2 bedroom flats: 1.5-1 space per unit;
 - Studio: 1 space per 2 units.

47. These standards exceed those set out in the London Plan (2011). When applying car parking standards to a scheme, a range of matters should be considered including local circumstances and the character and nature of the site and scheme. Parking standards should reflect PTAL and be expressed as maximums.

Conclusion

48. We wish to reserve BL and SEGRO's right to attend the Examination in Public on the Local Plan Part 2 to further represent their comments. We trust the above is helpful and will be taken into account. We would be happy to discuss further, should this be required.

Yours faithfully

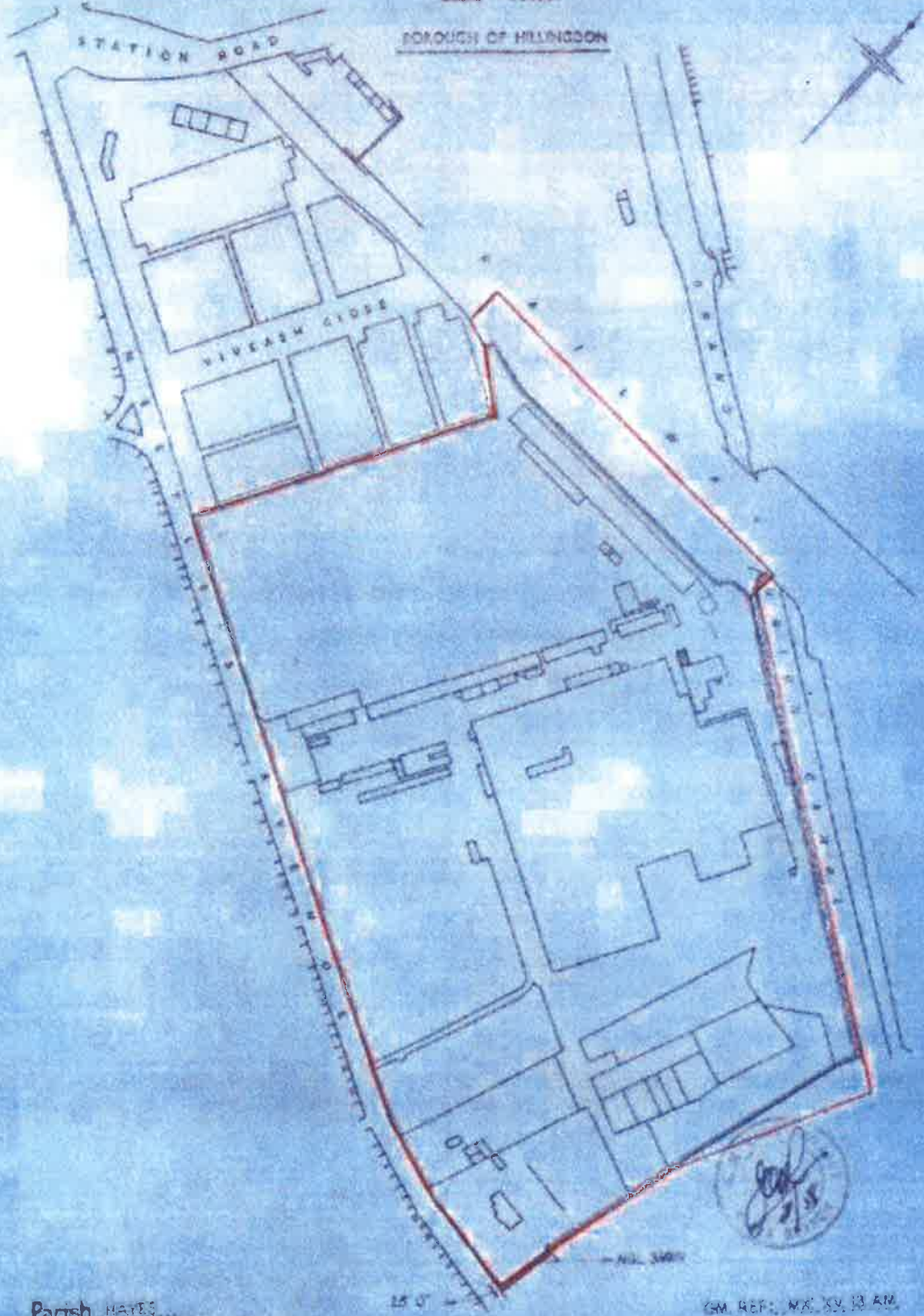


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PLAN 1

APPENDIX 6
GLA PRE-APPLICATION RESPONSE

former Nestle Factory, Hayes

in the London Borough of Hillingdon

The proposal

Part demolition of existing buildings and redevelopment (up to 12-storeys) to provide up to 1,400 new homes; 21,367 sq.m. of commercial space (B1c, B2, B8 uses and sui generis); 560 sq.m. of community uses; and 5 hectares of publicly accessible open space.

The applicant

The applicant is **Barratt London** and **SEGRO**, and the architects are **Makower Architects**, **de Metz Forbes Knight**, **Hawkins Brown** and **MSA**.

Context

1 On 27 July 2016 a request was received by the Greater London Authority (GLA) for a pre-planning application meeting to discuss a proposal to develop the above site for the above uses. On 25 August 2016 a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- Graham Clements – Senior Strategic Planner, GLA (case officer)
- Colin Wilson – Senior Manager – Planning Decisions, GLA
- Maja Jorgensen – Housing Zone Area Manager, GLA
- Edmund Bird – Senior Designer Historic Building and Conservation, GLA
- Philip Exton – Energy Consultant, GLA
- Fred Raphael – Principal Planner, TfL

Applicant team

- Claire O'Rourke and Martin Scholar – Barratt London
- Neil Impiazzi – SEGRO
- Robin Meakins – Barton Willmore
- Tim Makower – Makower Architects
- Julian de Metz – dMFK
- Lee Page – MSA
- Jenny Baker – Odyssey Markides
- Kate Hodson – Hodkinson
- Mike Cousins – WPP

Local Planning Authority

- Matt Kolaszewski – Principal Planning Officer, Hillingdon Council
- James Rodger – Head of Planning and Enforcement, Hillingdon Council

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor’s formal consideration of an application. Please note that the advice you receive is dependent upon the quality of the information and documentation that you provide.

Site description

3 The former Nestle factory site is located in Hayes, within the Heathrow Opportunity Area and Hayes town centre Housing Zone. The site comprises 12.5 hectares of land bound by Nestles Avenue and interwar suburban housing to the south; North Hyde Gardens and an electricity substation to the east; the Grand Union Canal and Great West Railway line to the north; and, a series of light industrial buildings to the west.

4 First established in 1911, the Hayes Nestle factory employed up to 2,000 people at its peak during the 1950s. More recently, following the steady contraction of its operations at the site, Nestle announced in 2012 that it was to close the factory. The site was finally vacated in 2015, and remains unoccupied to date.

5 The site is designated as the Botwell Nestle Conservation Area, and is occupied by a number of Locally Listed Buildings, comprising: the main factory building (Truscon building and Sandow building); a canteen building for staff amenity; a lodge; and, gates an railings along Nestles Avenue (refer to figure 1 below). There are also a number of mature Conservation Area trees at the site, mainly distributed along the southern frontage.



Fig. 3.1.7: Phasing plan of site development 1914 to present

Figure 1: Nestle factory buildings 1914 to present.

6 The site is generally well served by public transport, and is approximately 600 metres from Hayes and Harlington rail station (which will benefit from Crossrail services from May 2018). Overall the site registers a public transport accessibility level (PTAL) of one(b) to four, on a scale of zero to six(b), where six(b) denotes the most accessible locations in the capital.

Details of the proposal

7 Part demolition of existing buildings and redevelopment (including restoration and conversion of some historic buildings/facades) to provide up to 1,400 new homes; 21,367 sq.m. of commercial space (B1c, B2, B8 uses and sui generis); and, 560 sq.m. of community uses, in buildings of up to 12-stories with 5 hectares of publicly accessible open space.

8 With respect to the Locally Listed Buildings at the site, the following is proposed:

Main factory building (Truscon building and Sandow building)

- Retention and refurbishment of high quality east, south and western facades (including surviving elements of the 1914 Sandow building). Roof extension and new-build elements north of the Sandow building, and a Truscon facsimile northern facade. The former industrial buildings would be converted to residential accommodation and wrapped around a new-build commercial warehouse.

Canteen building

- Restoration and refurbishment of the canteen and colonnade, with a new-build element to the north. The former staff amenity buildings would be converted for nursery use and flexible small to medium sized enterprise (SME) space.

Lodge

- Proposed demolition in order to facilitate delivery of the large-footprint commercial space.

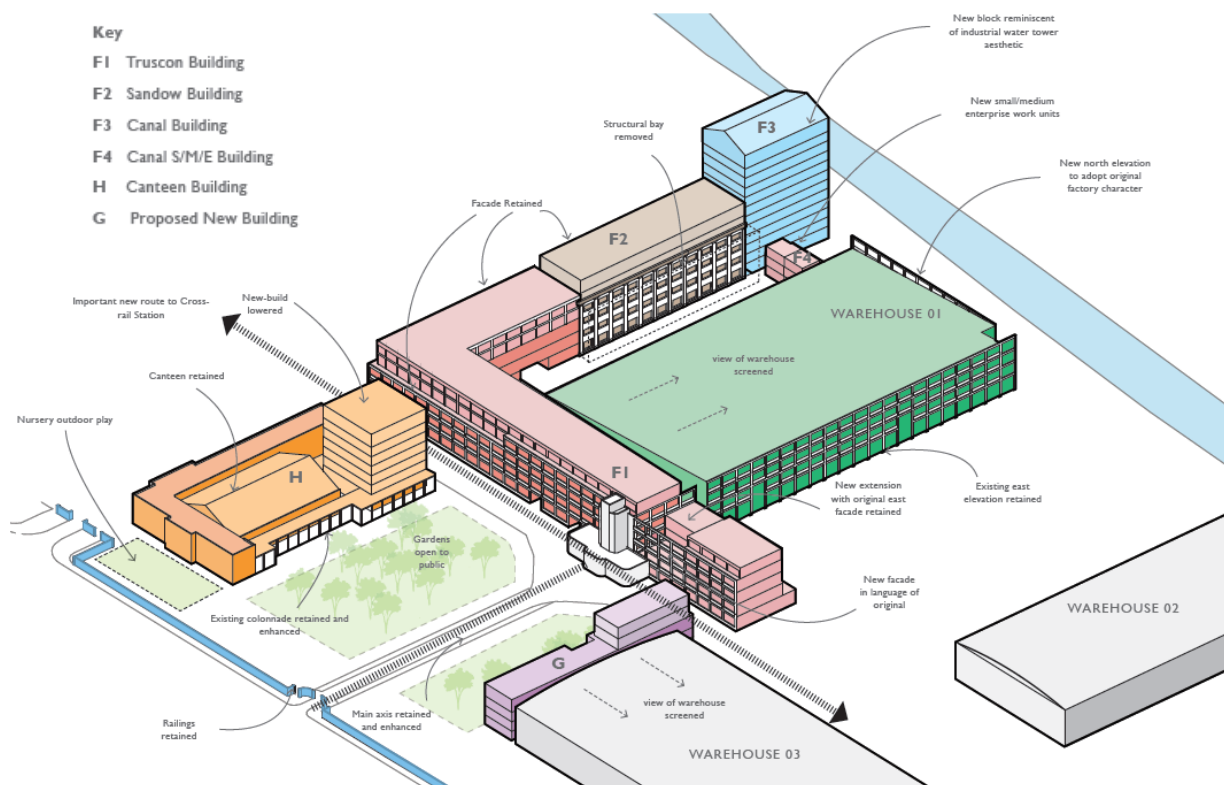


Figure 2: Proposed approach for the historic core

Strategic planning issues and relevant policies and guidance

9 The relevant strategic issues and corresponding policies are as follows:

- Opportunity Area *London Plan;*
- Strategic Industrial Location *London Plan;*
- Employment *London Plan;*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy;*
- Density *London Plan; Housing SPG;*
- Social infrastructure *London Plan;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Historic environment *London Plan;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Mayor's Ambient Noise Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; and Mayoral Community Infrastructure Levy.*

10 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Hillingdon Local Plan part 1; 2007 Hillingdon Saved UDP Policies; and, London Plan 2016 (Consolidated with Alterations since 2011).

11 The following are also relevant material considerations: National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance; and, draft Hillingdon Local Plan part 2 (revised proposed submission version).

12 Furthermore, pursuant to the City in the West plan and the designation of Hayes town centre as a Housing Zone in March 2016, the GLA is working jointly with Hillingdon Council and other local stakeholders to draft a Hayes Opportunity Area Planning Framework.

Summary of meeting discussion

13 Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to: principle of development (Opportunity Area and Strategic Industrial Location); employment; housing; social infrastructure; urban design; historic environment; sustainable development; and transport. Further to discussion at the meeting, advice in respect of these issues is set out within the sections that follow.

Principle of development

14 Noting the emerging approach within the Hillingdon Local Plan part 2 with respect to employment land management (refer below), and having regard to the wider Heathrow Opportunity Area context, the proposed mixed use redevelopment of this site to provide both employment and residential uses is strongly supported in strategic planning terms.

Opportunity Area

15 London Plan Policy 2.13 identifies the Heathrow Opportunity Area as having capacity to accommodate a minimum of 9,000 new homes and 12,000 additional jobs. The London Plan also specifically recognises the Hayes-West Drayton corridor as offering a range of redevelopment opportunities - including small business parks, logistics and mixed uses. Having regard to this policy context, the proposal to deliver 21,367 sq.m. of high quality employment floorspace and up to 1,400 new homes, is strongly supported.

16 More generally, following the designation of Hayes town centre as a Housing Zone in March 2016, and in conjunction with Hillingdon Council's emerging Local Plan proposals for employment land management (discussed below), the GLA is working with the Council to develop a strategic planning framework to help manage the anticipated growth in this part of the Heathrow Opportunity Area, in the catchment of Crossrail 1.

Strategic Industrial Location

17 The site is located within the wider Nestles Avenue industrial cluster – designated within the Hillingdon Saved UDP Policies as a Strategic Industrial Location (SIL). The Nestles Avenue industrial cluster comprises approximately 34 hectares of land south of the railway, and extends eastwards from Station Road, across North Hyde Gardens, and encompasses the electricity substation and land beneath the Hayes Bypass. Having undertaken a review of employment land in the borough, Hillingdon Council proposes to release 16 hectares of SIL land within the Nestles Avenue industrial cluster (including the former Nestle factory site) as part of its emerging Local Plan part 2.

18 Following consideration of this draft plan, a statement (reference D&P/LDF14/LDD18/CG) issued on 7 December 2015 by the GLA Assistant Director – Planning (acting under delegated authority) confirms that this approach is in general conformity with the London Plan.

19 Accordingly, whereas London Plan Policy 2.17 resists development on SIL land for non-industrial type uses, noting the emerging mixed use land allocation for this site within the (proposed submission) Local Plan part 2, GLA officers support the proposed mixed use redevelopment of this site in strategic planning terms.

Employment

20 The applicant is devoting approximately five hectares of land at the east of the site to employment uses. Across the masterplan as a whole, the scheme would provide up to 21,367 sq.m. of employment uses, which is estimated to support approximately 400 operational jobs at the site. This is strongly supported in line with London Plan Policy 2.7.

21 Two main types of employment space were presented at the meeting: high specification large footprint commercial buildings; and, the possibility of smaller scale SME creative workspace units within the refurbished canteen building. The former, to be managed by SEGRO, responds well to the strategic characteristics of this location in terms of logistics and related

demand associated with Heathrow Airport, and the latter presents a valuable opportunity to provide affordable workspace for local 'start up' companies.

22 As discussed at the meeting, the provision of affordable workspace is a key priority within the Mayor's manifesto. Noting also the emphasis that London Plan policies 2.7 and 2.17 place on sustaining SMEs, and, in order to support the outer London economy, the applicant is strongly encouraged to incorporate an affordable SME workspace offer as part of the proposed development. This should be worked up in partnership with an established workspace provider in order to offer a flexible and accessible package of workspace terms designed to incubate and support new businesses.

Housing

23 This site forms part of the wider Hayes Town Centre Housing Zone, which has been prioritised for accelerated housing delivery with GLA funding support. Whilst the proposed residential schedule is still to be finalised, the scheme is currently understood to include up to 1,400 residential units. The proposed quantum of housing would considerably exceed the target minimum output for this site within Hillingdon Council's emerging site allocation (SA5), and would represent 25% of the Council's borough-wide housing target up to 2025. The proposed provision of these units is therefore strongly supported in accordance with London Plan Policy 3.3.

Affordable housing

24 Whilst the detail of the affordable housing offer is still to be established, it is understood that the applicant has engaged in initial discussions with a Registered Provider, and is seeking to optimise the level and tenure of affordable housing in response to policy requirements, scheme viability and the characteristics of the local context. Whilst London Plan Policy 3.11 sets a strategic tenure split target of 60/40 (affordable rent and intermediate affordable), in the context of the site by site approach advocated by Local Plan Policy H2, GLA officers are open to discussion on optimising the tenure split in order to maximise the number of affordable housing units delivered on site. This is in line with London Plan Policy 3.12, which seeks the maximum reasonable amount of affordable housing.

25 To inform negotiations in this regard, the Local Plan establishes a Borough-wide strategic affordable housing target of 35%. The same target has been adopted for the Hayes Housing Zone.

26 As discussed at the meeting, Mayor intends to publish a consultation draft Affordable Housing SPG in November 2016. This is expected to establish a benchmark level of 35% affordable housing (with a policy compliant tenure split) as a cut off for the requirement for a scheme viability review process. I.e. where a scheme proposes 35% affordable housing, a viability report need not be prepared and submitted.

27 Nevertheless, if an offer of less than 35% is made, the applicant will be required to submit a viability appraisal in support of the proposed scheme. This should be rigorously tested by the Council and its independent consultants, with all key appraisal inputs scrutinised, including: benchmark land value; developer profit margin (relative to scheme risk); build costs (including any exceptional costs associated with historic restoration etc.); and, sales values. Both the submitted appraisal, and the findings of the independent review, would need to be shared with the GLA. The applicant is strongly encouraged to meet the 35% benchmark in order to simplify the planning process, and help deliver the Mayor's manifesto commitments.

Mix of units

28 Based on discussions at the meeting it is understood that the proposed housing schedule is still being developed. Noting the prevailing context of interwar suburban family housing in this case, and the linkages to Hayes and Harlington Station and the town centre, a weighting towards smaller units within the private market housing provision of this scheme would be acceptable in strategic planning terms. However, in accordance with London Plan Policy 3.11, the applicant will be expected to prioritise the provision of family sized affordable housing units as far as possible.

Residential standards, density and children's play space

29 With respect to residential standards, the applicant confirmed that the scheme is being designed to meet and exceed London Plan minimum space standards (Policy 3.5). This is supported, and in line with London Plan Policy 3.8 the applicant will need to provide 10% of units as wheelchair accessible/easily adaptable (Building Regulation requirement M4 (3)) and the remaining 90% as accessible and adaptable (Building Regulation requirement M4 (2)).

30 Having regard to Table 3.2 in support of London Plan Policy 3.4, the suburban nature of the surrounding context (and the varying PTAL) would generally suggest a residential density of 150 to 350 habitable rooms per hectare / 35 to 90 units per hectare. However, in line with guidance within the Housing SPG, the characteristics of this particular Opportunity Area site (including its size and existing large-scale buildings) offer the potential to introduce a transition from the suburban setting to a neighbourhood of a more urban character. Such an approach would support sustainable intensification of a suburban brownfield site, and capitalise on the benefits of Crossrail. Accordingly, the applicant is proposing a residential density of 200 units per hectare. Whilst this would exceed the general range identified by the London Plan, noting the particular characteristics of this site the proposed density is supported in strategic planning terms as an exemplar of suburban town centre intensification.

31 The applicant also confirmed at the meeting that it was developing a children's play strategy, and identified various suitable locations for play on site. These proposals include doorstep play space within semi-private communal courtyard spaces, but also include play opportunities within the proposed public realm. As the detail of the proposed residential mix emerges, the applicant is encouraged to continue to progress the development of the on-site play strategy in response to estimated child yield, in accordance with London Plan Policy 3.6 and the Play and Informal Recreation SPG.

Social infrastructure

32 London Plan Policy 3.7 states that large residential developments should, where necessary, coordinate the provision of social, environmental and other infrastructure. Given the quantum of residential development proposed in this case, it will be important that the scheme appropriately contributes towards the infrastructure necessary to support sustainable communities.

33 In terms of social infrastructure, it is noted that the applicant is providing space for a potential nursery as part of a community centre within the scheme. This is strongly supported, and could provide enhanced facilities (as part of a relocation strategy) for the existing Children's Centre at the western end of Nestles Avenue.

34 More generally, the GLA is working with Hillingdon Council to commission a development infrastructure funding study (DIFS) to identify the full range of infrastructure necessary to support anticipated growth within the Hayes Housing Zone. It is understood from

discussions at the meeting that the Council foresees a requirement for a new primary school within the Housing Zone. This potential requirement is being examined further as part of a local educational needs study, and the findings of this will inform the Hayes Housing Zone DIFS. Hillingdon Council and the GLA will keep the applicant team informed of developments in this regard accordingly.

Urban design

35 As discussed in paragraph 12, the GLA is working jointly with Hillingdon Council and other local stakeholders (including the applicant) to prepare a Hayes Opportunity Area Planning Framework (OAPF). The emerging draft OAPF sets out strategic design principles for this site in the form of a wider masterplan for the emerging Hillingdon site allocation SA5.

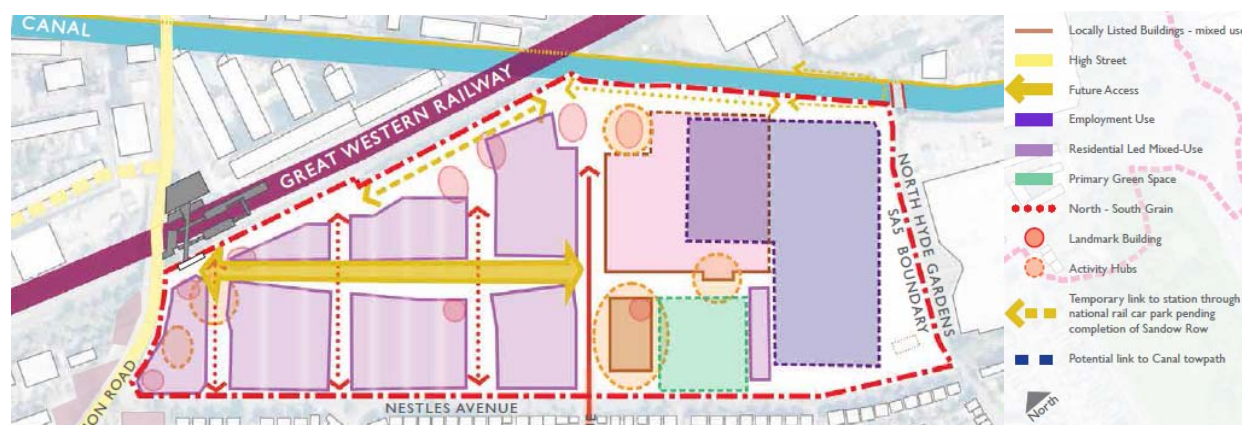


Figure 3: Draft Hayes OAPF masterplan principles for site SA5.

37 The draft OAPF masterplan essentially seeks to establish a new east-west route into the heart of the site, connecting the historic Nestle factory core with the station and high street. The canal edge at the north of the site would also be opened up, supporting improved connections with the wider Blue Ribbon Network and Green Chain corridors associated with the Crane Valley to the east. The masterplan seeks to retain the high quality Truscon and Sandow factory building facades, as well as the canteen building and adjacent green space. In terms of scale, the OAPF envisages 12-storeys along the railway, transitioning to 2 to 3-storeys along Nestles Avenue, but with an opportunity for a local landmark building (12-storeys) at the Station Road junction.

Masterplan layout

38 As demonstrated by figure 4, the proposed scheme in this case responds very well to the draft OAPF design principles, and would successfully manage the critical interface between residential; mixed use historic core; and, commercial employment uses. This would be achieved through the adoption of a legible residential street pattern - supported by the careful retention and conversion of the historic factory buildings (as described in paragraph 8); and, the use of these historic buildings (and various new-build elements) to wrap/buffer the large-scale commercial uses. This arrangement also ensures that the commercial uses would benefit from direct access to North Hyde Gardens, and the strategic road network beyond.

39 The arrangement of the proposed masterplan would also deliver considerable improvements to the southern edge of the Grand Union Canal (which is currently inaccessible in this location). These improvements include the provision of a high quality landscaped towpath, fronted by a mix of residential and commercial uses. In conjunction with activation from residential blocks and a potential canoe club, the proposed location of the commercial office units at this edge would work

very well in terms of providing passive overlooking and amenity space to support the aims of London Plan policies 7.3 and 7.27.



Figure 4: Proposed masterplan for former Nestle factory site.

Height, scale and massing

40 The scale of the proposal ranges from two-storeys (along Nestles Avenue at the interface with suburban hinterland) to 12 to 15-storeys (at the railway edge). The approach to scale generally accords with that within the draft OAPF masterplan, and would be successful in terms of optimising the development potential of the site, and providing an appropriate response to the varying site edge conditions. Notwithstanding this, as part of meeting discussions it was acknowledged that the Council’s conservation officer had expressed concerns with respect to the scale of a 7-storey new-build block north of the retained canteen building. In urban design terms GLA officers are of the view that this block is of an appropriate scale, and helps to support a positive sense of enclosure for the proposed public space at Wallis Gardens. However, further visualisations would be beneficial as set out in paragraph 46 below.

Residential design quality

41 With respect to the proposed residential building typologies, the applicant proposes a mix of houses with back gardens, and apartment blocks with balconies/internalised private amenity space and communal garden areas. These typologies have been carefully arranged to respond to the various sensitivities of their context, and to create clearly defined and well-activated streets. Moreover, the prevailing north-south alignment of apartment blocks allows dwellings to benefit from favourable sun-lighting conditions. With respect to the element of residential conversion at the Truscon building, it is noted that the arrangement has been particularly well-considered to provide a favourable aspect and outlook for dwellings (as well as deck access for south-facing units in the main factory building).

42 More generally the plans and layouts presented demonstrate that the scheme would respond well to the residential design principles within the Housing SPG (in terms of maximising dual aspect units; providing ground floor residential entrances; and optimising unit to core ratios). Furthermore, subject verification that potential issues of noise and vibration (from the railway

and/or commercial uses) would be suitably mitigated (refer to the sustainable development section below), GLA officers are of the view that the scheme would exhibit a very high standard of residential design.

Historic environment

43 As discussed at the meeting, and having had regard to the proposed public benefits of this scheme, GLA officers are of the view that a favourable balance has been struck between the loss and retention of Locally Listed Buildings within the Botwell Nestle Conservation Area. More generally, officers are of the view that the proposed scheme (including a new residential neighbourhood; mixed use core; and new employment quarter) would significantly enhance the character of the Botwell Nestle Conservation Area. More detailed heritage consideration with respect to specific areas of the scheme are set out below.

Truscon building

44 The proposal to fully restore the 'art deco' tower and its interiors (including the staircase and ground floor room) is strongly supported. Furthermore, in response to previous informal discussions, the revised roof extension design (substituting a saw-tooth profile for a simpler approach) is welcomed. The proposed extension on the main factory building is acceptable on the basis that it would be sufficiently set back so as not to compromise the integrity of the retained and restored 1930s facade, or the silhouette and presence of the 'art deco' tower. The decision to retain the eastern Truscon building elevation (as a front door to a new-build commercial unit behind) is particularly welcomed, as is the facsimile elevational response to the canal edge.

Sandow building (and adjoining new-build blocks)

45 The reconstruction of this largely hidden/lost historic element is strongly supported. Officers are satisfied that the scale, height, siting and massing of the proposed new-build blocks adjacent would not harm the integrity, setting, character and appearance of the retained elevations.

Canteen block

46 The proposed restoration of this block (including the former dining hall and its colonnade and the attached two-storey L-block) is strongly supported. No objection is raised to the demolition of the single-storey lavatory block to the rear, however, as discussed at the meeting, additional detail and visualisations are sought with respect to the proposed medium-rise block that would replace this. Essentially, it should be demonstrated that the proposed new block would sit comfortably in its context, and be sympathetic to adjacent heritage assets.

New-build block G (fronting eastern edge of Wallis Gardens)

47 It is noted that the positioning of this block would result in a slight loss of symmetry for the formal garden layout - in terms of the dimension of green space either side of the central avenue. Nevertheless, this block would provide a positive sense of enclosure and active residential frontage to the garden, and would not harm the character of the Conservation Area or setting of Locally Listed Buildings.

Lodge

48 The proposed loss of this interwar villa is regrettable. However, it is noted that this Locally Listed Building is of a very different architectural style to the art deco/modern movement 1930s factory and staff amenity buildings which define the primary character of the Conservation Area. Having regard to this; the proposed retention and refurbishment strategy for the remainder of the Locally Listed Buildings; and, the high quality of the new build elements and their positive contribution to the character of the Conservation Area generally – this proposed loss is outweighed.

Inclusive access

49 London Plan Policy 7.2 seeks to ensure that future development meets the highest standards of accessibility and inclusion, and requires that design and access statements explain how the principles of inclusive design, including the specific needs of disabled people, have been addressed.

50 In the interests of supporting housing choice for disabled people, GLA officers expect the 10% provision of wheelchair accessible/adaptable homes to be provided as both house and flat typologies within the scheme. Blue Badge parking should also be provided on a 1:1 basis for wheelchair accessible dwellings, and conveniently located close to entrances/cores.

51 The proposed landscaping strategy (including the integrated play facilities, trim trail and new section of canal towpath) is strongly supported. In working up the detail of this the applicant is advised to pay close attention to the treatment of gradients, as well as any public realm steps or shared spaces – to ensure that these would not present unintended barriers to inclusive access.

Sustainable development

Energy strategy

52 In accordance with London Plan Policy 5.2 the applicant should provide an energy assessment which complies with the principles of the London Plan energy hierarchy. Recently updated guidance on the format for the energy assessment is available on the GLA website here: www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0.

53 The Mayor currently applies a target reduction of 35% against Part L of Building Regulations 2013 for the purposes of assessing carbon dioxide savings against London Plan Policy 5.2. However, as explained within the abovementioned energy assessment guidance, the carbon reduction target for new development changed on 1 October 2016 to 'zero carbon' (as defined in section 5.2 of the Housing SPG for residential development) for referred applications received by the Mayor on or after this date.

54 The carbon dioxide emission figures should be reported against a Part L 2013 baseline. For the refurbished elements of the development the applicant should follow the methodology outlined in the GLA energy assessment guidance document. The carbon dioxide savings for the new and refurbished elements should be presented separately within the energy strategy, making clear how the new build element is performing against current standards.

55 Further detailed comments on the draft energy strategy presented to GLA officers is set out below:

- The applicant should commit to meeting Part L 2013 by efficiency measures alone. Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.
- The applicant has undertaken preliminary modelling to assess the overheating risk and will undertake a full assessment using the CIBSE TM52 methodology with current and future weather scenarios, this is welcomed. The applicant should particularly consider how best to mitigate any restrictions posed by, for example, local air quality or noise issues, ground floor apartments and single aspect units. It is understood that corridors are proposed to be heated, this was identified as a potential overheating concern at the meeting. The applicant should demonstrate that the heated corridors would not overheat i.e. outline the control strategy given that corridors are generally confined find spaces that receive heat gains from dwellings and pipework.
- A domestic overheating checklist is included in the GLA's energy guidance which should be completed and used to identify potential overheating risk and passive responses early in the design process. The completed checklist should be included as an appendix of the energy statement.
- The applicant has investigated opportunities for connection to nearby district heating networks. The applicant has acknowledged that the Southall Gasworks site is within the vicinity, however it is understood that delivery of the network is likely to come after the delivery of this scheme. Evidence of correspondence with Ealing Council and the developer of the network should be provided in the energy statement, this should include anticipated timescales. The applicant has committed to providing a site-wide heating network, suitable for connection to wider district networks now or in the future.
- In line with GLA guidance for large-scale developments (1,000 or more dwellings) the applicant should investigate the feasibility of including additional space within the energy centre and capacity within the site heat network to supply heat to nearby developments and, where applicable, existing buildings. The applicant should contact the local borough energy officer to determine whether the development site could form part of an energy masterplan within the area. Evidence of correspondence should be provided.
- The site has confirmed that the site will be served by a single energy centre with all building uses on the site should be connected to the site wide heat network. A plan of the proposed distribution network should be provided, which should also include information on how the network will be built out in relation to the phasing of the development.
- A plan showing the size and proposed location of the energy centre should be provided. As outlined above extra capacity should be investigated for potential future expansion.
- The applicant is proposing CHP as the lead heat source of the development. Information on the CHP should be provided including the size of the engine proposed (kWe/kWth); proportion of heat met by the CHP; the number of operating hours; and whether there will be provision of a thermal store. The applicant should also provide the analysis used to determine the size of the CHP including, suitable monthly demand profiles for heating, cooling and electrical loads. The plant efficiencies used when modelling carbon savings should be based on the gross fuel input for gas rather than the net values often provided by manufacturers.
- The applicant should provide information on the management arrangements proposed for the system, including anticipated costs.
- In line with Policy 5.7 the applicant has investigated the inclusion of on-site renewable energy generation and solar PV is proposed, a plan showing the proposed location of the installation should be provided.

Climate change adaptation

56 London Plan policies 5.10 and 5.11 seek the incorporation of new green infrastructure as part of development proposals, and Policy 5.13 requires the use of sustainable urban drainage systems to reduce surface water runoff. The applicant confirmed that it was exploring options for rainwater attenuation and potential green/brown roofs. This is supported, and the future submission should include firm proposals for these measures where feasible and viable. GLA officers also welcome the proposed development of landscaping proposals for the canal towpath, which, along with amenity space should include opportunities for the planting of native species to support local biodiversity and access to nature in accordance with London Plan Policy 7.19.

57 Whilst the applicant seeks to retain existing high quality mature trees wherever possible, it is understood that a number of trees may need to be removed in order to facilitate the redevelopment. Such proposals will need to be supported by an arboricultural report, and a replacement planting strategy in line with London Plan Policy 7.21.

Noise and vibration

58 The proximity of the railway to the north of the site is expected to present potential issues for residential quality associated with noise and vibration. Uses within the proposed large scale commercial units may also generate similar issues. In order to support a high quality residential environment, and protect the flexibility of the proposed new employment space, it is understood that a number of dwellings on sensitive facades will require noise attenuation measures. GLA officers are of the view that these issues should be capable of acceptable mitigation through standard design and construction measures. Nevertheless, in support of the future application and in line with London Plan Policy 7.15, the applicant will need to submit a noise assessment which considers the acoustic environment at the site, and identifies any necessary mitigation measures required.

Transport

59 A detailed transport assessment (TA), prepared in accordance with TfL's Best Practice Guidance www.tfl.gov.uk/info-for/urban-planning-and-construction will need to be submitted in support of the future planning application.

Car parking

60 Whilst TfL would support a parking ratio of 0.4 spaces to units at this site, a level of 0.5 (as currently proposed) is acceptable in strategic planning terms. This would respond to the arrival of Crossrail; promote the use of more sustainable modes of transport; and be beneficial in terms of mitigating the traffic impacts of the development (particularly on the Bulls Bridge Roundabout). The applicant will also need to set out justification for the proposed level of car parking provided for other land uses, particularly the large scale commercial units.

61 It is advised that parking controls are introduced for adjoining streets in order to address the risk of potential overspill parking that might otherwise arise as a result of the development. In this regard it is understood that Hillingdon Council is commissioning a review of on-street parking in the area - with a view to including the adjoining roads within a Controlled Parking Zone (CPZ). This is supported.

Modelling requirements

62 The scope of transport modelling for this scheme has been subject to various joint discussions with TfL and Hillingdon Council. It should be noted that, subject to the outcome of the modelling and analysis, TfL may seek appropriate contributions towards improving the Bulls Bridge Roundabout and others part of the Transport for London Road Network impacted on by the development.

Walking and cycling

63 TfL has advised in its own dedicated pre-application letter that the applicant is required to undertake a review of the pedestrian and cycle environment in the vicinity of the site, and to address any deficiencies identified through the Section 106 and/or Section 278 process.

Bus service improvements

64 As part of the meeting, potential changes to the bus services in the vicinity of the site were discussed. In this regard TfL and Hillingdon Council are jointly exploring the feasibility of serving Nestles Avenue with a bus service. The requirement for this would be new bus stops; a bus stand; and somewhere for buses to turn. The junction of Nestles Avenue and Station Road would need to be changed to allow buses to turn right, out of Nestles Avenue. It is also likely that some parking along Nestles Avenue would need to be withdrawn. Further information on this work can be provided in due course, and some feasibility work may need to be undertaken as part of the application.

Conclusion

65 Having regard to the emerging land allocations within the Hillingdon Local Plan, the proposed mixed use redevelopment of this vacant industrial site to provide both new employment space and new homes, as part of a heritage-led masterplan, is strongly supported in strategic planning terms.

66 More generally, the approach taken on this site represents an exemplar for other major growth corridors in London (such as Crossrail 2) - through the successful consolidation of employment land, and sustainable integration of large scale commercial elements with high density housing in a highly accessible location.

67 The applicant should, nevertheless, ensure that the issues discussed in this report with respect to employment; housing; social infrastructure; urban design; historic environment; inclusive access; sustainable development; and transport are fully addressed by the future planning application.

for further information contact GLA Planning Unit, Development & Projects Team:

Colin Wilson, Senior Manager – Planning Decisions

020 7983 4271 email colin.wilson@london.gov.uk

Graham Clements, Senior Strategic Planner (case officer)

020 7983 4265 email graham.clements@london.gov.uk

APPENDIX 7
TfL PRE-APPLICATION RESPONSE



Our ref: 16/1322

Jenny Baker

BY E-MAIL ONLY

22 June 2016

Dear Jenny,

Former Nestle Site, Nestles Avenue, Hayes, Hillingdon – TfL Pre-application Advice Letter

Thank you for taking advantage of the TfL pre-application advice service, which is aimed at ensuring the preparation of developments that are successful in transport terms and conforms to relevant London Plan policies. This letter sets out the advice provided by TfL on the transport issues discussed at the pre-application meeting held on 8th June 2016.

The following comments are made by TfL officers on a 'without prejudice' basis only. You should not interpret them as indicating any subsequent Mayoral decision on any planning application based on the proposed scheme. Furthermore, these comments also do not necessarily represent the views of the Greater London Authority.

The letter summarises the key points that we discussed at the meeting as well as the comments provided by TfL colleagues who were unable to attend.

A site visit was undertaken by Fred Raphael on Tuesday 7th June 2016. The pre-application meeting was attended by the following persons:

Jenny Baker
Stacey Capewell
Claire O'Rourke
Daniel Osbourne

Odyssey Markides
Odyssey Markides
Barratt London
Barton Willmore

Fred Raphael
Alison Cowie
Dan Booth
Alina Sechrest
Huy Nguyen
Syed Shah

TfL Borough Planning
TfL Borough Planning
TfL Bus Network Development
TfL Road Space Management
TfL Strategic Analysis
LB Hillingdon

TfL understands that the applicant is aiming to submit a planning application to Hillingdon Council at the end of August.

Development Overview

The development proposal comprises of the redevelopment of the Former Nestle Site in Hayes to provide c. 1,400 residential (C3) units and ancillary community facilities, retail use, amenity and play-space. The mix of units and tenure has not been determined at this stage but it is understood that the development will include a range of sizes (1 – 4 bedroom units) and include both private and affordable homes.

The proposal will include car parking at a ratio of 0.5 per residential unit, with access taken from solely from North Hyde Road and Nestle Avenue. It is clear that the adjoining SEGRO site will take access from North Hyde Gardens but the subject site will be served only by the accesses in Nestle Avenue.

The pre-application pack submitted by the applicant included the following documents:

- Transport Assessment Scoping Report;
- Site Location Plan;
- Red Line Boundary Plan;
- Proposed Block Plans; and
- Masterplan – Landscaping Plan.

Following the pre-application meeting of 8th June 2016, the applicant submitted a plan of the PERS and CERS study area for approval by TfL. These have been reviewed and commented on in this letter.

Site Description and Context

The development site is located in Hayes, Hillingdon. The site is bounded by the Grand Union Canal and Great Western Rail Line to the north, Nestles Avenue to the south, the remainder of Nestle site to the east and other employment and commercial buildings to the west.

The nearest rail station is Hayes and Harlington station, located within 500m of the centre of the site. Hayes & Harlington station provides national rail services from London Paddington station. This station will become part of Crossrail and will provide frequent services between East London and Reading when Crossrail becomes operational in 2018.

The site is accessible by eight (8) bus routes – E6, U5, 90, 350, H98, U4, 140 and 195 – with frequencies ranging from 5 to 8.5 vehicles per hour. As a result of the transport provisions described above the site generally records a public transport accessibility level of 4 on a scale of 1-6b, where 1 is poor and 6b is excellent. There are small pockets of the site that records a PTAL of 2 and 3. The public transport accessibility level of the site will increase to 5 with the operation of Crossrail.

The nearest strategic road that TfL is responsible for is The Parkway, which forms part of the TLRN (A312) to the east of the site. Bulls Bridge Roundabout (A312) is approximately 600m from the site. The nearest strategic road (SRN) is Uxbridge Road, which is approximately 2.5kms to the north-east of the site.

The M4 motorway runs to the south of the site and is within 1.5km of the site. The M4 motorway is under the management of Highways England.

Approach to Transport Assessment

The applicant has been advised that a transport assessment will need to be produced in accordance with TfL's transport assessment Guidance, available from: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>. Further details on the specific requirements are set out below.

The applicant submitted a transport assessment scoping note, which was circulated to all attendees prior to the pre-application meeting. The contents of this note formed the basis of discussion at the pre-application meeting.

It is understood that the proposal is still evolving but the development quanta discussed is unlikely to change. At the meeting we discussed the methodology for assessing the net impacts of the development. There was a lengthy discussion on whether it was more appropriate to treat the existing site as a 'brownfield' or 'greenfield' site in assessing the net impacts of the proposal. The planning and transportation arguments for either approach were discussed at the meeting.

The planning argument for treating the site as a brownfield site is that the current use of the site is lawful, notwithstanding that the operations on the site have been winding down for a number of years and eventually ceasing in 2014. In theory the site could continue in its current use if another operator decided to occupy the existing buildings.

The transportation argument is that several of the existing buildings, are currently in a poor state of repair and is unsuitable for occupation in the future, which suggests that the site is unlikely to continue in its current use and therefore should be treated as a greenfield site. There is merit in both arguments and after much deliberation all parties generally agreed that the way forward might be to await the outcome of the structural survey, which will determine the buildings that needs to be demolished and those that can be retained and reoccupied.

TfL therefore expects that the existing (B2) use that is used to assess the net impacts of the proposal to consist of the floorspace that could potentially be reoccupied in the future. TfL is happy to discuss this issue further, following the outcome of the structural survey of the existing buildings on the site.

The trip rates for the existing B2 use and the proposed residential use are acceptable. The transport assessment will use the residential trip rates adopted for the nearby consented Old Vinyl Factory. The trip generation figures in the note will need to be updated in response to the revised existing B2 floorspace, as per the comments above. The calculations for the net trip generation and net traffic impact will need to be updated accordingly.

The transport assessment will need to include a cumulative assessment. The list of committed developments that will be included in the assessment should be agreed with Hillingdon and subsequently confirmed with TfL before undertaking the cumulative assessment.

The transport assessment scoping note is generally satisfactory and provides a good basis to proceed with assessing the development's impacts. However, TfL expects the transport assessment to reflect the advice offered at the meeting.

Traffic Modelling Requirements

Regarding the assessment of the traffic impacts of the development, there was considerable discussion on TfL's modelling requirements for its network. TfL advised that the use of LinSig, TRANSYT and PICADY alone would be inadequate and that VISSIM model encompassing the A312 corridor (including Bulls Bridge Roundabout and M4 J3) would be needed. TfL advised that a HAM model would be more appropriate to assess the proposal, given the context of the site. The site is an area of

housing growth and identified as a site that is suitable for considerable number of residential units (Draft Hillingdon Site Allocations and Designation, Local Plan Part 2).

TfL is aware that a separate discussion between the applicant and Hillingdon on the geographic scope of a VISSIM model is taking place.

Since the pre-application meeting on 8th June 2016, TfL met with the applicant and their specialist modelling consultants on 21st June 2016 to further discuss the modelling requirements for VISSIM and WelHAM. The minutes of this agreement will set out what was discussed between the parties, the agreed actions and the arrangements for access to the model. TfL agreed at that meeting the strategic impacts of the proposal will be assessed using WelHAM, whilst the local junctions will be assessed by LinSig and TRANSYT. The applicant will continue dialoguing with the appropriate TfL officers regarding access to TfL's models and to agree on the finer details of the modelling work required, such as the geographic scope of the models, the scenarios to be modelled, appropriate sensitivity tests, assumptions, timescales, and costs, etc.

Please note access to TfL's strategic models is restricted to accredited consultants only and license fees apply. There will also be additional costs associated with auditing an applicant's work.

Joe Birdseye is responsible for the A312 corridor and is the TfL lead on the operational modelling relating to this area. Huy Nguyen will lead on matters relating to TfL's strategic highways model (WelHAM).

It should be understood, subject to the outcome of the modelling, that TfL is likely to seek appropriate contributions towards Bulls Bridge Roundabout and other parts of the TLRN impacted by the development.

Walking and Cycling

A review of the pedestrian and cycle environment in the vicinity of the site will need to be undertaken. A plan of the CERS and PERS study area was submitted by the applicant. TfL is broadly content with the extent of the study area. New surveys will only be required for areas that have not been covered in surveys undertaken to support recent planning approvals in the area.

TfL's expectation is that the development will deliver improvements to the pedestrian and cycling environments in the vicinity of the site through improvements to the highway adjoining the site, secured by s.278 agreement or other necessary off-site improvements identified, secured by s.106 agreement.

TfL is aware of Hillingdon Council's aspiration to secure a southern access for Hayes & Harlington Station through developments in the area. It is envisaged that this access will help improve the station accessibility by providing a shorter, more direct pedestrian access to the site. Whilst TfL appreciates the potential benefits of a southern access, this proposal will depend on the support of the Crossrail Team. TfL is not aware that the borough has engaged Crossrail on this proposal at this stage.

Site access

Details of the access arrangements for all modes will be set out in the transport assessment and other submission documents but it is understood that the main

access to the development for all modes will be via the retained, albeit modified, accesses in Nestles Avenue. TfL has no particular concerns about the location of these, but expects the design to be supported by appropriate analyses, such as swept path diagrams for the largest vehicles that will access the site, and adequate inter-visibility between vehicles emerging from the site and pedestrians and cyclists in Nestles Avenue. It is understood that vehicles will continue to access the site via North Hyde Road.

Car parking

The applicant proposes a maximum car parking provision of 0.5 per dwelling, which equates to 700 car parking spaces. Parking will be accommodated in two perimeter blocks and on the internal private roads.

Given the known problems of heavy traffic congestion on the adjoining road network, particularly Bulls Bridge Roundabout, TfL will require the transport assessment to demonstrate that the level of car parking proposed will not be detrimental to the operation the adjoining road network. It is worth considering a reduction in the level of car parking to address potential traffic impacts that is likely to arise from the development and the combined traffic impacts created by developments in the area; and to promote the use of public transport and other sustainable modes.

TfL is cognisant of the fact that the surrounding roads are not subject to parking controls and that the council is in the process of commissioning a review of on-street parking in the area in order informs its decision to consult on the introduction of a controlled parking zone (CPZ). A CPZ will need to be in place prior to occupation of the development in order to prevent overspill parking from the development. TfL expects that occupiers will be prevented from applying for permits to park in a future controlled parking zone (CPZ). This requirement will need to be secured through the Section 106 agreement for the site.

A high proportion of car parking will need to be designed and allocated for use by disabled residents. Assuming compliance with London Plan Policy 3.8 (*“ten per cent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users”*.) a provision of 1 space per wheelchair accessible dwelling would need to be provided.

Electric vehicle charging points (EVCPs) must be provided in accordance with the London Plan – 20% active and 20% passive. The location of electric vehicle charging points within the car park should be indicated on the submission drawings. The applicant should also consider the provision of car club bays (on-street or off-street) as part of their parking strategy for the development, as a means of reducing car ownership. Contributions towards car club membership and potentially additional on-street bays may be appropriate.

Cycle parking

Details of the quantum, location of cycle parking will need to be set out in the transport assessment and supporting documents. The applicant proposes to include cycle parking that meets the requirements of the London Plan. TfL is pleased but will comment on the details of provision for cyclists following a review of the transport assessment.

Supporting facilities such as lockers, showers and changing rooms for long-stay cyclists associated with the commercial use is encouraged. Consideration should be given to providing spaces for less conventional bicycle types, such as tricycles, cargo bicycles and bicycles with trailers. Best practice guidance in the provision of cycle parking is set out in section 8 of the London Cycling Design Standards.
<http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>

Public Transport Impacts and Improvements

Subject to agreeing the outcome of any trip generation assessment, TfL may request mitigation for any site specific impacts on the public transport network that may be created by the development. This may include but is not limited to contributions towards bus stop upgrades, bus capacity or improvements to rail or underground facilities. This will be confirmed when the transport assessment is reviewed.

TfL Buses advised that bus trips will need to be broken down by routes and corridors. There was a discussion around creating new bus stops and a bus stand along Nestles Avenue to facilitate the extension of a bus route closer to the site. The extension of the bus route (or routes) may require changes to nearby junctions as well as the likely loss of on-street parking along Nestles Avenue. There is no firm proposal at this stage to extend the bus routes but this is likely to be sought as an intervention. TfL Buses will liaise with Hillingdon to discuss the likely impacts of the development on the local bus network and to jointly explore and formulate options to address the development's impacts on buses. The proposed highway modelling will also be used to understand bus journey time impacts of the development.

Travel Plan

As well as the transport assessment, a Framework Travel Plan for the residential element of the development will need to be submitted alongside the planning application. The Framework Travel Plan should set out measures to encourage a mode shift from cars to other modes. The full Travel Plan will need to be submitted to the Council for approval prior to the occupation of the development and should include provisions for reviewing and monitoring. The Travel Plan should be secured through the Section 106 agreement.

In developing travel plans reference should be made to TfL's travel plan guidance available from TfL's website <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>. TfL also recommends that the ATTrBuTE assessment tool (available at www.attrbute.org.uk) is used when developing travel plans, to ensure they comply with TfL best practice guidance and the assessment should be included with the travel plans.

Delivery and Servicing

The transport Assessment must include a description of the arrangements for servicing and deliveries, including the location where servicing and deliveries will be accommodated; and details of the expected service and delivery trip generation for the proposed land uses. TfL expects the details of the servicing and deliveries to be formalised in a Delivery and Servicing Plan (DSP), which will be submitted to the Council prior to occupation of the development. The DSP should be secured through the Section 106 agreement.

TfL DSP Guidance is available at:

<https://tfl.gov.uk/info-for/freight/planning/delivery-and-servicing-plans?intcmp=7833>

Construction Logistics

TfL expects that the transport Assessment will include information on the provisions for construction vehicles, including vehicle routing, access and loading/ unloading arrangements, construction trip generation and mitigation. This information will need to be formalised in a Construction Logistics Plan, which will need to be submitted to the Council prior to construction of the development. A commitment should be made to the use of contractors that are members of the Freight Operators' Recognition Scheme (FORS).

Further guidance on CLPs is available at:

<https://tfl.gov.uk/info-for/freight/planning/construction-logistics-plans>

Community Infrastructure Levy

In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. The levy is charged at £35 per square metre of additional floor space in the Hillingdon Council area. The required CIL should be confirmed by the applicant and Council once the components of the development have been finalised.

Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>

Summary

TfL is generally satisfied with the scope of the transport assessment, subject to the it reflecting the issues and further actions identified in this letter.

I hope this provides a useful basis upon which to progress the transport assessment and look forward to receipt of your planning application.

Should you wish to discuss any part of this letter, please contact myself or Fred Raphael (fredraphael@tfl.gov.uk - 020 3054 7141)

Yours Sincerely,



Lucinda Turner
Acting Director of Borough Planning
Email: lucindaturner@tfl.gov.uk
Direct line: 020 3054 7133

Cc: Meeting Attendees

APPENDIX 8
HISTORIC ENGLAND PRE-APPLICATION RESPONSE



Historic England

LONDON OFFICE

Mr Robin Meakins
Barton Willmore
7 Soho Square
London
W1D 3QB

Direct Dial: 020 7973 3763

Our ref: PA00425893

12 May 2016

Dear Mr Meakins

Pre-application Advice

FORMER NESTLE FACTORY, HAYES

Thank you for contacting Historic England about the proposed redevelopment of the *Botwell: Nestles, Hayes Conservation Area* in Hillingdon. Thank you also for organising the very useful site visit which we attended with the local authority on 21 April.

As you know, I have taken this case to an internal peer review to establish a formal position on the proposals. As is required under our pre-application advice service, I am writing to share our formal position with you, and I hope this will lead to a constructive discussion when we next meet this Thursday.

Significance of the Historic Environment

The development site occupies the entirety of the *Botwell: Nestles, Hayes Conservation Area* which is located close to Hayes & Harlington Train Station. There is currently no conservation area appraisal or management plan, and so we can only provide a general summary of its significance.

It is clear that the conservation area has a strong industrial character by virtue of its canal setting and its various buildings associated with the Nestle Company who occupied the site from 1916 to 2012. A number of these buildings are architecturally distinguished and provide an insight into the workings of the factory site.

From our on-site observations and the information available, we would suggest that the conservation area is characterised by:

- The aesthetic value of the modernist 'Truscon' Nestle Factory by Wallis Gilbert & Partners and the *moderne* Canteen building which share an architectural language. Also, the townscape character of the site as expressed by its high-quality boundary railings, tree-lined driveways and canalside setting.



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

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- The historical value of the conservation area as an example of the industrial development around the Hayes canal and train station. The remaining open spaces around the factory hint at the original 'factory garden' philosophy behind the Nestle development and this adds to its historical value.
- The communal value of the Nestle factory site (particularly the buildings visible from the public realm such as the canteen, lodge and factory) as a famous brand and local landmark to the Hayes community.

Four of the buildings within the conservation area also locally listed. These are:

- *Nestle Works: Lodge*
- *Nestle Works: Gates / Railings*
- *Nestle Works (the Wallis Gilbert factory)*
- *Nestle Works: Former Canteen*

It should also be noted that the conservation area is included on Historic England's Heritage at Risk Register and it is clear that its condition has deteriorated following Nestle's departure from the site in 2012.

Impact of the Proposed Development

These proposals seek to demolish most of the buildings on site with parts of the boundary railings and front facade of the factory building retained. Some landscape features such as the main tree-lined driveway and adjacent green spaces would also be retained. It is then proposed to develop two separate schemes. The north-east end of the conservation area would remain in commercial use and would include a large business unit, service warehouse and yard, and a car park. A large-scale residential-led scheme by Barratt London is proposed for the remainder of the site. The residential buildings would range from 3-12 storeys in height, and the associated landscaping would include the extension of the Hayes Towpath along the canal. Due to site restrictions, it is understood that the towpath is unlikely to be extended into the adjacent commercial site.

Relevant Policies

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the obligation on local planning authorities to pay special regard to preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development', a key component of which includes protecting and enhancing the historic environment. In general terms, the document places great weight on: the desirability of sustaining and enhancing the



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Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

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significance of heritage assets and putting them to viable uses consistent with their conservation; their potential to contribute to sustainable communities; and the desirability of new development making a positive contribution to the historic environment's distinctiveness.

Specific policies relevant to the current application include:

- Paragraph 131 which states that local authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness
- Paragraphs 133 and 134, which provide advice on development proposals that result in harm to designated heritage assets.
- Paragraph 135 which states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining applications. In weighing applications that affect non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset
- Paragraph 137, which states that local authorities should look for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance; and paragraphs 133 and 134, which provide advice on development proposals that result in harm to designated heritage assets.

We would also urge you to consider the London Borough of Hillingdon's emerging local plan policies and site allocations. Specifically, draft policy SA5 which refers specifically to the Nestle site and includes commitments to retain and re-use locally listed buildings and sustain and enhance the significance of heritage assets (p34).

Historic England's Position

A detailed conservation area appraisal would be of benefit at this early stage so the impact of these proposals on the significance of the *Botwell: Nestles, Hayes Conservation Area* can be fully assessed. We would therefore advise at this early stage, that you engage in discussions with the London Borough of Hillingdon's Conservation Team to establish a sound evidence base to underpin the sustainable development of this area.

In the absence of an area appraisal, as set out in this letter, we feel that the conservation area possesses a strong industrial character with clear aesthetic, historical and communal value. We therefore disagree with the conclusion presented by CGMS in their Heritage Statement (April 2016) that the conservation area fails to meet the criteria for designation.



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With this in mind, and on the basis of the information available, the demolition of most of the structures on site and the erection of the large-scale development as currently presented would appear to neither preserve or enhance the character or appearance of the conservation area, and would cause a significant level of harm in our view. Furthermore, because of the disjointed nature of the masterplan (as a result of the two separate developments) we feel that opportunities are not being taken for the development to make a positive contribution to local character and distinctiveness.

The impact on locally-listed building is more clear-cut in terms of planning policy. The proposed demolition of two locally listed building and the substantial demolition of a third does represents a scale of harm which does not appear to be balanced in our view. The loss of these undesignated heritage assets also conflicts with the emerging planning policies contained within the London Borough of Hillingdon's emerging Local Plan.

We therefore consider that the application as currently proposed fails to meet the underlying heritage-related policies and legislation identified above. We do, however, support the redevelopment in principle, in the interest of securing a sustainable use for this 'at risk' site. Moreover, there is clearly much scope for enhancement by redeveloping poor quality parts of the conservation area and removing undesirable accretions from significant buildings.

There would also be much heritage-related public benefit in providing public access through the conservation area, and we would therefore urge further exploration into extending the canal towpath through the site between Hayes & Harlington Station and the bridge at North Hyde Gardens.

Regarding the masterplanning and design, we consider that the mix of uses as currently proposed can be accommodated from a heritage viewpoint; however, it is important that there is coherence in design and masterplanning terms between the commercial and residential sites. We would also suggest that successful redevelopment schemes in areas of a similar architectural and industrial character could help inform and influence the design approach, and we would be happy to provide you with examples as these proposals move forward.

Next Steps

We would urge you to address the above advice and would be happy to advise further on these proposals following Thursday's meeting and once a position has been agreed with the local authority.



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Yours sincerely

Alasdair Young

Inspector of Historic Buildings and Areas

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cc:

FORMER NESTLE FACTORY, HAYES
Pre-application Advice

Information Provided
Freetext



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Mr Julian de Metz
dMFK Architects Ltd
119 Cholmley Gardens
London
NW6 1AA

Direct Dial: 020 7973 3763

Our ref: PA00425893

8 September 2016

Dear Mr de Metz

Pre-application Advice

FORMER NESTLE FACTORY, HAYES

Thank you again for presenting updated proposals for the former Nestle factory site in Hayes to me at our meeting on 11 August, and for issuing me with subsequent revisions which were recently presented to the GLA and the London Borough of Hillingdon.

Summary

Historic England welcomes the many positive revisions to the scheme that have been secured throughout this pre-application process, and the opportunities that are now being offered to enhance the character of the *Botwell: Nestles, Hayes* Conservation Area.

We do have some outstanding concerns regarding the scale of some of the interventions, and the need for further structural information in support of the proposed retention of the Truscon Building facades. We also remain somewhat disappointed about the proposed site allocations which we consider constrain the design and architectural integrity of the residential scheme for the Truscon Building. These issues should be addressed and fully justified in the event of an application being submitted for the scheme as currently proposed.

Historic England's Advice

I enclose, with this letter, our original advice issued to Barton Willmore issued on 12 May, in which we concluded that the scheme as initially proposed would fail to preserve or enhance the character of the conservation area, and would cause a significant amount of harm. We also disagreed with the findings of the Heritage Statement which concluded that the Nestle site did not merit conservation area designation.



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Since then a number of significant changes have been made to the scheme in order to address these concerns, and a new heritage statement is being developed by Turley on the premise that the site is a legitimate designated heritage asset. A summary of our position on these changes is set out below:

Main Factory Building

The Main Factory Building lies at the heart of the conservation area and comprises of the inter-war Truscon Building which incorporates parts of the earlier Sandow Building of 1919. There are a number of later additions to the factory which we consider mainly detract from the architectural integrity of the Truscon Building, and these are identified in the Presentation Document you have shared. The one exception is the c1960 entrance tower at its south corner which forms a focus for the building as enhanced by the associated geometric landscaping.

The proposed revisions demonstrate that the undesirable accretions would be removed and the integrity of the Truscon Building facades restored on three sides, with the north elevation adopting the 'original factory character'. The clearing away of the later accretions and formation of public realm at the northern end would reinstate a sense of the canal-side setting of the Factory. The 1960s tower and associated landscaping would be retained and restored, and would once again provide the main entrance to the building. The accretions around the Sandow Building would be removed and the west-facing façade restored with missing elements reinstated. This demonstrates a greatly improved understanding of the conservation area's significance which has clearly influenced the design approach and presented opportunities to enhance its character.

Whilst these changes are strongly welcomed, it is crucial that the Factory Building as perceived externally retains a sense of authenticity (notwithstanding the internal changes) for these elements of the scheme to be presented as convincing heritage benefits. We would therefore strongly advise that further structural information is provided to demonstrate that the Truscon and Sandow façades can be retained (rather than rebuilt), and that no substantial alterations to the elevation of the Segro site is required to accommodate vehicular access. It would be helpful if demolition plans could then be provided on the basis of the findings.

It was mentioned at our meeting that the majority of the Truscon and Sandow Building windows are not original and wholesale replacement is proposed with glazing patterns to reflect the originals. This could present another opportunity to enhance significance if this can be justified in the heritage statement. It was also mentioned that external insulation to the Factory Building is being considered. We would discourage external



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insulation if it would have a significant impact on the appearance of the external elevations. We would be happy for trials to be undertaken in a discrete part of the building to identify the extent of build up required.

Regarding the proposed interventions to the Factory Building, we continue to note the challenges that the proposed warehouse presents in developing a fully integrated and architecturally resolved scheme. In our opinion, the area east of the Truscon part of the Main Factory building to be of relatively low significance and in our opinion would provide a more flexible industrial space for the Segro site. A more integrated and architecturally resolved residential scheme could then be explored for the Truscon Building which would potentially be of enormous benefit to the character of the conservation area. In the event of an application being submitted in line with the current proposals, the site allocations will require clear and convincing justification.

Regarding the residential elements, we are very pleased to see that the sawtooth roof and forecourt areas to the Factory Building have been removed from the scheme. This will help to retain the Modernist simplicity of the Truscon Building. However, the submitted documentation suggests that the new flat roof extension may impact on the prominence of the stair tower in views from the main driveway. As we have previously expressed, this element should remain a prominent feature of the conservation area, and therefore a reduction in height of the extension around the tower is encouraged.

Finally, it would be helpful to understand how the residential units would appear externally. Our strong preference is to see the industrial character of the building retained with no new floor plates interrupting the window pattern. As discussed at our meeting, it would be very helpful if a visual assessment is undertaken to demonstrate the impact of the various interventions on the Main Factory Building, particularly the approach from the main driveway, and any internal changes that could be visible from the public realm should be taken into consideration when making this assessment.

Canteen

The Canteen is an attractive Art Deco building with strong historical and communal associations with the Nestle factory. We therefore continue to welcome its proposed retention as a result of our pre-application discussions. This will include the repair and reuse of its separate entrance gates, and the retention of its lofty internal hall space and external colonnade.

We also consider the reduction in height of the proposed residential building at its north end to be a positive step. However we remain of view that its scale should not compete with the prevailing building heights in this part of the conservation area, and that taller buildings on site should be contained within the proposed residential cluster



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at the north-west corner. We would therefore welcome a further reduction in height of this building so it relates with the height of the residential development in the Main Factory.

Landscaping, Public Realm, and Townscape

We are also encouraged by the emerging landscaping proposals, which seek to reinstate a sense of the 'factory Garden' character of the Conservation Area. In particular, we welcome the reinforcing of the main access from Nestle Avenue and retention of its soft landscaping.

The creation of active frontages along the main pedestrian routes should help to animate the Conservation Area and raise its profile. We particularly welcome the proposed activity to the rear of the Main Factory Building, in the interest of revealing and enhancing the canal-side setting of the Conservation Area. However, we note that canal-side public realm would be limited due to the proposed boundary for the neighbouring industrial site.

Conclusion and Next Steps

In our view, the development as currently proposed represents a substantial improvement on the scheme as initially presented. Various steps are being taken to enhance the character of the *Botwell: Nestles, Hayes* Conservation Area, as informed by a greater level of analysis, and this is strongly welcomed. The proposals therefore respond to a number of key historic environment policies, which will help support the application.

The substantial changes to the Truscon Building and the accommodating of the proposed warehouse within it, will undoubtedly cause some harm, and this will require clear and convincing justification and the delivery of public benefits in accordance with national planning policy.

I hope this advice is helpful, and we would look forward to providing further advice either at pre-application or application stage.

Yours sincerely

Alasdair Young

Inspector of Historic Buildings and Areas

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cc Daniel Osborne, Barton Willmore
Jonny Wong, DMFK



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Mr Robin Meakins
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Direct Dial: 020 7973 3763

Our ref: PA00425893

17 October 2016

Dear Mr Meakins

Pre-application Advice

FORMER NESTLE FACTORY, HAYES

Thank you for providing me with updated plans for the Nestle site in Hayes following our meeting on 21 September. I enclose a copy of our previous pre-application advice for ease of reference.

Historic England's Advice

As previously set out, we welcome the many positive revisions that have been secured throughout our pre-application discussions and recognise that significant efforts are being made to 'reveal and enhance' the significance of the *Botwell: Nestles, Hayes* Conservation Area. However, we maintained a number of concerns at our last consultation, and you have sought to resolve these in the updated plans you have shared. I will address these issues in turn, taking into account the current revisions.

Residential Tower Between the Canteen and Main Factory

We raised concern about the scale of the residential tower which we felt harmed the visual relationship between the Canteen and Main Factory (the two key components of the Conservation Area). We recommended that all taller elements should be contained within the proposed residential cluster at the north-west corner of the site. Consequently, the tower has been further reduced to six stories with the top storey set in to reduce the visual impact. From the drawings provided, the scale of the tower now sits comfortably with that of the Main Factory building in our opinion. Moreover its design evokes the Modernist and industrial character of the site, and we recognise the role that the block plays in defining the street junction between Wallis Gardens and Sandow Square. We note that the tower remains several stories taller than the Canteen; however, on balance we no longer have significant concerns with this element of the proposals.

Main Factory Southern and East Elevations, and 1960s Stair Tower

We raised concern about the proposed roof extension to the Main Factory where it



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appears behind the 1960s Tower in important views. Consequently the new southern wing adjacent to the Tower has been significantly reduced in height and set back from the building line. This allows the Tower to remain a focal point in these important views. This is strongly welcomed.

The setting back of the wing also allows the retention of the connection between the south and east elevations in views from the public realm. This also is strongly welcomed; however it would be helpful to fully understand the means of security and separation between the residential and industrial parts of the building now that facades are fully connected.

In response to our concerns about the utilitarian approach to the fenestration of the east elevation (which we felt reduced the architectural integrity of the building) it is now proposed to introduce metal framed glazing to resemble the glazing pattern elsewhere. Ceramic panels will be required however in order to meet the commercial requirements. We welcome the efforts made by Segro to satisfy these concerns. However, we maintain that these commercial requirements prevent a fully integrated design from being achieved, which respects the Modernist character and uniformity of the Truscon building.

It is encouraging that Barratt London and Segro are engaged in discussions with structural engineers in order to demonstrate that the facades of the Truscon building can be retained throughout the construction work. We are also very pleased to learn that the Truscon building will now be internally insulated, rather than externally.

The Proposed Land Uses for the Site

You have helpfully provided additional justification for the proposed land uses and the required industrial floor space for the Nestle Site. This includes reference to the London Borough of Hillingdon's emerging Local Plan which allows for a mix of uses on the site. We support the principle of a mix of uses in the interest of creating a diverse and sustainable environment for this historically important part of the Borough. However, it is unfortunate that development parameters for the site, as informed by a sound heritage assessment, were not established at the beginning of your pre-application discussions with Hillingdon Council.

Conclusion and Next Steps

Historic England welcomes the various revisions to the scheme and the collaborative approach that has been taken with us throughout the pre-application process. We recognise that various efforts are being made to 'preserve and enhance' the character of the Conservation Area, which we consider respond positively to Paragraph 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).



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We do, however, maintain that some harm to the Conservation Area will inevitably be caused to the overall integrity of the site and particularly the Truscon building in the proposed land uses. It is for the Local Planning Authority to be convinced that this harm is justified, and outweighed by public benefits in accordance with Paragraphs 132 and 134 of the National Planning Policy Framework respectively.

We are now happy to await consultation at application stage. However I would be interested to hear of any updates following your meeting with the Council next week.

Yours sincerely

Alasdair Young

Inspector of Historic Buildings and Areas

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**APPENDIX 9
PLANNING POLICY REVIEW**

Planning Policy Review

1. The policies of the following documents are set out below:

- National Planning Policy Framework (NPPF) (March 2012);
- The London Plan (Consolidated with Alterations since 2011) (March 2016);
- The Hillingdon Local Plan: Part 1- (LPP) Strategic Policies (November 2012);
- The extant 2007 Saved Unitary Development Plan (UDP) Policies adopted as the Hillingdon Local Plan: Part Two;
- Emerging Hillingdon's Local Plan: Part 2 (LPP2) – Development Management Policies (Submission Version) (October 2015); and
- Emerging Hillingdon's Local Plan: Part 2 – Policies Map (Submission Version) (October 2015).

2. The relevant policies in each of the documents above are set out below by policy topic:

PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

NPPF

3. Paragraph 7 of the NPPF states:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

4. Paragraph 14 of the NPPF states:

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

For decision-taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

5. Paragraph 17 of the NPPF states:

Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;
- not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

London Plan

6. Policy 1.1 of the London Plan states:

Delivering the strategic vision and objectives for London

Strategic

- A. Growth and change in London will be managed in order to realise the Mayor's vision for London's sustainable development to 2036 set out in paragraph 1.48 and his commitment to ensuring all Londoners enjoy a good, and improving quality of life sustainable over the life of this Plan and into the future.
- B. Growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without:
 - a) encroaching on the Green Belt, or on London's protected open spaces
 - b) having unacceptable Impacts on the environment. The development of east London will be a particular priority to address existing need for development, regeneration and promotion of social and economic convergence with other parts of London and as the location of the largest opportunities for new homes and jobs.
- C. Other mayoral plans and strategies, decisions on development proposals and investment priorities, and borough DPDs and development decisions should aim to realise the objectives set out in paragraph 1.53 so that London should be:
 - a) a city that meets the challenges of economic and population growth

- b) an internationally competitive and successful city
- c) a city of diverse, strong, secure and accessible neighbourhoods
- d) a city that delights the senses
- e) a city that becomes a world leader in improving the environment
- f) a city where it is easy, safe and convenient for everyone to access jobs opportunities and facilities

7. Policy 2.6 of the London Plan states:

Outer London: Vision and Strategy

Strategic

- A. The Mayor will, and boroughs and other stakeholders should, work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches through LDFs and other development frameworks to enhance and promote its distinct existing and emerging strategic and local economic opportunities, and transport requirements.
- B. The Mayor will, and boroughs and other stakeholders should, enhance the quality of life in outer London for present and future residents as one of its key contributions to London as a whole. The significant differences in the nature and quality of outer London's neighbourhoods must be recognised and improvement initiatives should address these sensitively in light of local circumstances, drawing on strategic support where necessary.

8. Policy 2.7 of the London Plan states:

Outer London: Economy

Strategic

- A. The Mayor will, and boroughs and other stakeholders should, seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends by:
 - a) enabling existing sources of growth to perform more effectively, and increasing the competitive attractiveness of outer London for new sectors or those with the potential for step changes in output
 - b) identifying, developing and enhancing capacity to support both viable local activities and those with a wider than sub-regional offer, including strategic outer London development centres (see Policy 2.16)
 - c) improving accessibility to competitive business locations (especially town centres and strategic industrial locations) through: making the most effective use of existing and new infrastructure investment; encouraging walking, cycling and public transport use; and enabling the labour market to function more efficiently in opening up wider opportunities to Londoners
 - d) providing strategic and local co-ordination within development corridors, including across the London boundary, to enhance competitive advantage and synergies for clusters of related activities and business locations, drawing on strategic support through opportunity area planning frameworks as indicated in Policy 2.13
 - e) ensuring that appropriate weight is given to wider economic as well as more local environmental and other objectives when considering business and residential development proposals

- f) prioritising improvements to the business environment, including safety and security measures; partnership-based approaches like business improvement districts; enhancing the vibrancy of town centres through higher density, retail, commercial and mixed use development including housing; providing infrastructure for homeworking; improving access to industrial locations; developing opportunities for decentralised energy networks and ensuring high quality design contributes to a distinctive business offer
- g) consolidating and developing the strengths of outer London's office market through mixed use redevelopment and encouraging new provision in competitive locations, including through the use of land use 'swaps'
- h) identifying and bringing forward capacity in and around town centres with good public transport accessibility to accommodate leisure, retail and civic needs and especially higher density housing, including use of the compulsory purchase process to assemble sites, and providing recognition and support for specialist as well as wider town centre functions. This will include mixed use redevelopment to address the challenges and consolidate the benefits of internet and multi-channel shopping as indicated in Policy 2.15
- i) managing and improving the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace including flexible, hybrid office/industrial premises
- j) co-ordinating investment by different public agencies to complement that of the private sector and promoting the competitive advantages of outer London for public sector employment, especially for functions of wider than sub-regional significance
- k) supporting leisure, arts, cultural and tourism and the contribution that theatres and similar facilities and the historic environment can make to the outer London economy, including through proactive identification of cultural quarters and promotion and management of the night time economy (see Policy 4.6)
- l) ensuring that strategic and local marketing of outer London's visitor attractions are effectively co-ordinated and that account is taken of its capacity to accommodate large scale commercial leisure attractions, especially in the north, east and south sectors
- m) ensuring that locally-driven responses to skills needs in outer London also help address strategic Londonwide objectives
- n) identifying and addressing local pockets of deprivation, and especially the strategic priorities identified in this Plan as regeneration areas (see Policy 2.14)
- o) establishing 'tailored' partnerships and other cross boundary working arrangements to address particular issues, recognising that parts of inner London also have 'outer' characteristics and vice versa, and that common areas of concern should be addressed jointly with authorities beyond London
- p) ensuring the availability of an adequate number and appropriate range of homes to help attract and retain employees and enable them to live closer to their place of work in outer London

9. Policy 2.13 of the London Plan states:

Strategic

A. Within the opportunity and intensification areas shown in Map 2.4, the Mayor will:

- a) provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realise these areas' growth potential in the terms of Annex 1, recognising that there are different models for carrying these forward; or

- b) build on frameworks already developed ; and
- c) ensure that his agencies (including Transport for London) work collaboratively and with others to identify those opportunity and intensification areas that require public investment and intervention to achieve their growth potential
- d) encourage boroughs to progress and implement planning frameworks to realise the potential of intensification areas in the terms of Annex 1, and will provide strategic support where necessary.

Planning decisions

B. Development proposals within opportunity areas and intensification areas should:

- a) support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks
- b) seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses
- c) contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks
- d) realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking
- e) support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.

LDF preparation

C. Within LDFs boroughs should develop more detailed policies

LPP1

10. Policy NPPF1 of the LPP1 states:

National Planning Policy Framework - Presumption in Favour of Sustainable Development

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

LPP2

11. Site allocation SA 5 of the LLP2 states:

Policy SA 5: Land to the South of the Railway, including Nestle Site

This is an important strategic site for Hayes town and the Borough as a whole. The Council will support proposals that meet the following criteria:

Site A

- The provision of up to 500 units. Densities higher than 80 uph may be acceptable subject to high quality design. Higher density development should be located along the canal frontage.
- A minimum of 20 % of the site (2.4 ha) should be used for employment generating uses. Suitable uses will include B1 and elements of B2 that are compatible with the residential elements of the scheme.
- Small scale commercial uses to support residential uses will be considered suitable. 10% of the site (1.2 hectares) should be used for open space and a sports pitch;
- Education facilities; and
- The provision of community facilities, including a public park.
- Proposals should include a heritage assessment which considers the retention and reuse of Locally Listed structures on this site.
- Proposals should include high quality design that fully integrates the Grand Union Canal, ensures canal-side improvements and maximises the canal's recreational potential.
- Development should contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network

Sites B and C

The provision of up to 97 residential units on Site B and 110 residential units on Site C. Proposals should be consistent with the PTAL rating and take account of lower suburban densities to the south; and

A minimum of 50% of each site should contain employment generating uses including B1 office, and suitable B2 light industrial.

As a preference Sites A, and B and C should form a comprehensive development scheme across the whole site, and which:

- Sustains and enhances the significance of the heritage assets;
- Provides pedestrian links to Hayes Town Centre and key transport nodes; and
- Reflects the Council's latest evidence of housing need in terms of the type and tenure of residential units.

HOUSING DELIVERY**NPPF**

12. Paragraph 47 of the NPPF states:

To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

13. Paragraph 49 of the NPPF states:

Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

14. Paragraph 50 of the NPPF states:

To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and

- where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

15. Paragraph 51 of the NPPF states:

Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.

16. Paragraph 52 of the NPPF states:

The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.

London Plan

17. Policy 2.6 of the London Plan states:

Outer London: Vision and Strategy

Strategic

- A. The Mayor will, and boroughs and other stakeholders should, work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches through LDFs and other development frameworks to enhance and promote its distinct existing and emerging strategic and local economic opportunities, and transport requirements.
- B. The Mayor will, and boroughs and other stakeholders should, enhance the quality of life in outer London for present and future residents as one of its key contributions to London as a whole. The significant differences in the nature and quality of outer London's neighbourhoods must be recognised and improvement initiatives should address these sensitively in light of local circumstances, drawing on strategic support where necessary.

18. Policy 2.7 of the London Plan states:

Outer London: Economy

Strategic

- A. The Mayor will, and boroughs and other stakeholders should, seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends by:
- a) enabling existing sources of growth to perform more effectively, and increasing the competitive attractiveness of outer London for new sectors or those with the potential for step changes in output
 - b) identifying, developing and enhancing capacity to support both viable local activities and those with a wider than sub-regional offer, including strategic outer London development centres (see Policy 2.16)
 - c) improving accessibility to competitive business locations (especially town centres and strategic industrial locations) through: making the most effective use of existing and new infrastructure investment; encouraging walking, cycling and public transport use; and enabling the labour market to function more efficiently in opening up wider opportunities to Londoners
 - d) providing strategic and local co-ordination within development corridors, including across the London boundary, to enhance competitive advantage and synergies for clusters of related activities and business locations, drawing on strategic support through opportunity area planning frameworks as indicated in Policy 2.13
 - e) ensuring that appropriate weight is given to wider economic as well as more local environmental and other objectives when considering business and residential development proposals
 - f) prioritising improvements to the business environment, including safety and security measures; partnership-based approaches like business improvement districts; enhancing the vibrancy of town centres through higher density, retail, commercial and mixed use development including housing; providing infrastructure for homeworking; improving access to industrial locations; developing opportunities for decentralised energy networks and ensuring high quality design contributes to a distinctive business offer
 - g) consolidating and developing the strengths of outer London's office market through mixed use redevelopment and encouraging new provision in competitive locations, including through the use of land use 'swaps'
 - h) identifying and bringing forward capacity in and around town centres with good public transport accessibility to accommodate leisure, retail and civic needs and especially higher density housing, including use of the compulsory purchase process to assemble sites, and providing recognition and support for specialist as well as wider town centre functions. This will include mixed use redevelopment to address the challenges and consolidate the benefits of internet and multi-channel shopping as indicated in Policy 2.15
 - i) managing and improving the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace including flexible, hybrid office/industrial premises
 - j) co-ordinating investment by different public agencies to complement that of the private sector and promoting the competitive advantages of outer London for public sector employment, especially for functions of wider than sub-regional significance
 - k) supporting leisure, arts, cultural and tourism and the contribution that theatres and similar facilities and the historic environment can make to the outer London economy, including through proactive identification of cultural quarters and promotion and management of the night time economy (see Policy 4.6)
 - l) ensuring that strategic and local marketing of outer London's visitor attractions are effectively co-ordinated and that account is taken of its capacity to

accommodate large scale commercial leisure attractions, especially in the north, east and south sectors

- m) ensuring that locally-driven responses to skills needs in outer London also help address strategic Londonwide objectives
- n) identifying and addressing local pockets of deprivation, and especially the strategic priorities identified in this Plan as regeneration areas (see Policy 2.14)
- o) establishing 'tailored' partnerships and other cross boundary working arrangements to address particular issues, recognising that parts of inner London also have 'outer' characteristics and vice versa, and that common areas of concern should be addressed jointly with authorities beyond London
- p) ensuring the availability of an adequate number and appropriate range of homes to help attract and retain employees and enable them to live closer to their place of work in outer London

19. Policy 3.3 of the London Plan states:

Increasing Housing Supply

Strategic

- A. The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.
- B. Working with relevant partners, the Mayor will seek to ensure the housing need identified in paragraphs 3.16a and 3.16b is met particularly through provision consistent with at least an annual average of 42,000 net additional homes across London1 which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.
- C. This target will be reviewed by 2019/20 and periodically thereafter and provide the basis for monitoring until then.

LDF preparation

- D. D Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.
- E. Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF
- F. Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:
 - a) intensification (see policies 2.13, 3.4)
 - b) town centre renewal, especially centres with good public transport accessibility (see Policy 2.15)
 - c) opportunity and intensification areas and growth corridors (see policies 2.13 and 2.3)

- d) mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility (see policies 2.7, 2.11, 4.2-4.4)
- e) sensitive renewal of existing residential areas, especially in areas of good public transport accessibility (see policies 3.4, 3.5, 3.14).

- F. F Boroughs must identify new, and review existing housing sites for inclusion in LDFs.
- G. G Boroughs should monitor housing capacity and provision against the average targets in Table 3.1, local housing needs assessments and the sensitivity ranges set out in the SHLAA report and updated in the London Plan Annual Monitoring Report.

20. Policy 3.4 of the London Plan states:

Optimising Housing Potential

Strategic, LDF preparation and planning decisions

- A. Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.

Policy 3.8 of the London Plan states:

Housing Choice

Strategic

- A. Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

LDF preparation and planning decisions

- B. To inform local application of Policy 3.3 on housing supply and taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:
 - a) new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these
 - a1) the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery
 - b) provision of affordable family housing is addressed as a strategic priority in LDF policies
 - c) ninety percent of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'
 - d) ten per cent of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users
 - e) account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision

- f) account is taken of the needs of particular communities with large families
- g) other supported housing needs are identified authoritatively and co-ordinated action is taken to address them in LDF and other relevant plans and strategies
- h) strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.
- i) the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.
- j) appropriate provision is made for the accommodation of service families and custom build, having regard to local need.

21. Policy 3.12 of the London Plan states:

Negotiating Affordable Housing On Individual Private Residential And Mixed Use Schemes

Planning decisions and LDF preparation

- A. A The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:
 - a) current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 3.10 and 3.11 and having particular regard to the guidance provided by the Mayor through the London Housing Strategy, supplementary guidance and the London plan Annual Monitoring Report (see paragraph 3.68)
 - b) affordable housing targets adopted inline with Policy 3.11,
 - c) the need to encourage rather than restrain residential development (Policy 3.3),
 - d) the need to promote mixed and balanced communities (Policy 3.9),
 - e) the size and type of affordable housing needed in particular locations,
 - f) the specific circumstances of individual sites,
 - g) resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor,
 - h) the priority to be accorded to provision of affordable family housing in policies 3.8 and 3.11.
- B. Negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements.
- C. Affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

22. Policy 3.16 of the London Plan states:

Protection And Enhancement Of Social Infrastructure

Strategic

- A. London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population.

Planning decisions

- B. Development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.
- C. Facilities should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.

LDF preparation

- D. LDFs should provide a framework for collaborative engagement with social infrastructure providers and community organisations:
- a) for the regular assessment of the need for social infrastructure at the local and sub-regional levels; and
 - b) to secure sites for future provision or reorganisation of provision. Where appropriate, boroughs are encouraged to develop collaborative cross boundary approaches in the provision and delivery of social infrastructure.
- E. Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.
- F. The Mayor will work with boroughs, relevant social infrastructure providers and the voluntary and community sector as appropriate to extend proposed supplementary guidance on social infrastructure requirements, especially at the sub-regional and Londonwide levels.

Saved UDP

23. Policy H4 of the saved UDP states:

H4 wherever practicable a mix of housing units of different sizes should be provided in schemes of residential development including in particular units of one or two bedrooms. Within town centres predominantly one and two bedroom development will be preferable.

LPP1

24. Policy H1 of the LPP1 states:

Housing Growth

The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies. The borough's current target

is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021. Rolled forward to 2026, this target equates to a minimum provision of 6,375 dwellings over the period of the Hillingdon Local Plan: Part 1- Strategic Policies. Sites that will contribute to the achievement of this target will be identified in the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document (LDD).

AFFORDABLE HOUSING

London Plan

25. Policy 3.8 of the London Plan states:

Housing Choice

Strategic

A. Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

LDF preparation and planning decisions

B. To inform local application of Policy 3.3 on housing supply and taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:

- a) new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these
- a1) the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery
- b) provision of affordable family housing is addressed as a strategic priority in LDF policies
- c) ninety percent of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'
- d) ten per cent of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users
- e) account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision
- f) account is taken of the needs of particular communities with large families
- g) other supported housing needs are identified authoritatively and co-ordinated action is taken to address them in LDF and other relevant plans and strategies
- h) strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.
- i) the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.

- j) appropriate provision is made for the accommodation of service families and custom build, having regard to local need.

26. Policy 3.11 of the London Plan states:

Affordable Housing Targets

Strategic

- A. The Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing

LDF preparation

- B. Boroughs should set an overall target in LDFs for the amount of affordable housing provision needed over the plan period in their areas and separate targets for
- social/affordable rented; and
 - Intermediate

housing and reflect the strategic priority accorded to provision of affordable family housing and to making the best use of available resources to maximise affordable housing output.

- C. LDF affordable housing targets should take account of:
- a) current and future housing requirements identified in line with Policies 3.8, 3.10 and 3.11
 - b) the strategic targets and priority accorded to affordable family housing set out in section A above
 - c) the approach to coordinating provision and targets to meet the range of strategic, sub-regional and local affordable housing needs in London set out in Policy 3.8, paragraphs 3.65 - 3.67 and Supplementary Planning Guidance and the Mayor's London Housing Strategy
 - d) the need to promote mixed and balanced communities (see Policy 3.9)
 - e) capacity to accommodate development including potential sources of supply outlined in para 3.67
 - f) the viability of future development, taking into account future resources as far as possible.
- D. Affordable housing targets may be expressed in absolute or percentage terms in light of local circumstances, reflecting the priorities in 3.11 A-C above, the borough's contribution towards meeting strategic affordable housing targets in light of the framework set by the Plan and guidance in SPG. They should also provide a robust basis for implementing these targets through the development management process.

27. Policy 3.12 of the London Plan states:

Negotiating Affordable Housing On Individual Private Residential And Mixed Use Schemes

Planning decisions and LDF preparation

- A. The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:
- a) current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 3.10 and 3.11 and having particular regard to the guidance provided by the Mayor through the London Housing Strategy, supplementary guidance and the London plan Annual Monitoring Report (see paragraph 3.68)
 - b) affordable housing targets adopted inline with Policy 3.11,
 - c) the need to encourage rather than restrain residential development (Policy 3.3),
 - d) the need to promote mixed and balanced communities (Policy 3.9),
 - e) the size and type of affordable housing needed in particular locations,
 - f) the specific circumstances of individual sites,
 - g) resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor,
 - h) the priority to be accorded to provision of affordable family housing in policies 3.8 and 3.11.
- B. Negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements.
- C. Affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

28. Policy 3.13 of the London Plan states:

Affordable Housing Thresholds

Planning decisions and LDF preparation

- A. Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes, applying the density guidance set out in Policy 3.4 of this Plan and Table 3.2.
- B. Boroughs are encouraged to seek a lower threshold through the LDF process where this can be justified in accordance with guidance, including circumstances where this will enable proposals for larger dwellings in terms of floorspace

LPP1

29. Strategic Objective S07 of the LPP1 states:

Address housing needs in Hillingdon using appropriate planning measures.

Policy H2 states

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- Strategic

Policies. 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.

LPP2

30. Policy DMH7 of the LPP2 states:

- A) In accordance with national policy
- i) developments with a capacity to provide 10 or more units will be required to maximise the delivery of on-site affordable housing;
 - ii) subject to viability and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with the tenure split (70% Social/Affordable Rent and 30% Intermediate) as set out in Policy H2: Affordable Housing of the Local Plan Part 1.
- B) Affordable housing should be built to the same standards and should share the same level of amenity as private housing.
- C) Proposals that do not provide sufficient affordable housing will be resisted.
- D) To ensure that Policy H2: Affordable Housing of the Local Plan Part 1 is applied consistently and fairly on all proposed housing developments, the requirement for affordable housing will apply to:
- i) sites that are artificially sub-divided or partially developed;
 - ii) phased developments. Where a housing development is part of a much larger development of 10 or more units (gross), affordable housing will be required as part of the overall scheme; and
 - iii) additional units created through or subsequent amended planning applications, whereby the amount of affordable housing required will be calculated based on the new total number of units on the site. Affordable housing will be required where a development under the 10 unit threshold is amended to have 10 or more housing units in total (gross).
- E) 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.

EMPLOYMENT

NPPF

31. Paragraph 19 of the NPPF states:

The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.

32. Paragraph 20 of the NPPF states:

To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

33. Paragraph 22 of the NPPF states:

Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

London Plan

34. Policy 4.1 of the London Plan states:

Developing London's Economy

A The Mayor will work with partners to:

- a) promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors
- b) maximise the benefits from new infrastructure to secure sustainable growth and development
- c) drive London's transition to a low carbon economy and to secure the range of benefits this will bring
- d) support and promote outer London as an attractive location for national government as well as businesses, giving access to the highly-skilled London workforce, relatively affordable work space and the competitive advantages of the wider London economy
- e) support and promote the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity
- f) sustain the continuing regeneration of inner London and redress its persistent concentrations of deprivation
- g) emphasise the need for greater recognition of the importance of enterprise and innovation
- h) promote London as a suitable location for European and other international agencies and businesses.

35. Policy 4.4 of the London Plan states:

Managing Industrial Land And Premises

Strategic

A. The Mayor will work with boroughs and other partners to:

- a) adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial

and related uses in different parts of London, including for good quality and affordable space

- b) plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.

LDF preparation

- B. LDFs should demonstrate how the borough stock of industrial land and premises in strategic industrial locations (Policy 2.17), locally significant industrial sites and other industrial sites will be planned and managed in local circumstances in line with this strategic policy and the location strategy in Chapter 2, taking account of:
 - a) the need to identify and protect locally significant industrial sites where justified by evidence of demand
 - b) strategic and local criteria to manage these and other industrial sites
 - c) the borough level groupings for transfer of industrial land to other uses (see Map 4.1) and strategic monitoring benchmarks for industrial land release in supplementary planning guidance
 - d) the need for strategic and local provision for waste management, transport facilities (including inter-modal freight interchanges), logistics and wholesale markets within London and the wider city region; and to accommodate demand for workspace for small and medium sized enterprises and for new and emerging industrial sectors including the need to identify sufficient capacity for renewable energy generation
 - e) quality and fitness for purpose of sites
 - f) accessibility to the strategic road network and potential for transport of goods by rail and/or water transport
 - g) accessibility to the local workforce by public transport, walking and cycling
 - h) integrated strategic and local assessments of industrial demand to justify retention and inform release of industrial capacity in order to achieve efficient use of land
 - i) the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.

36. Policy 4.10 of the London Plan states:

New And Emerging Economic Sectors

Strategic, planning decisions and LDF preparation

- A. The Mayor will, and boroughs and other relevant agencies and stakeholders should:
 - a) support innovation and research, including strong promotion of London as a research location and encourage the application of the products of research in the capital's economic development
 - b) give strong support for London's higher and further education institutions and their development, recognising their needs for accommodation and the special status of the parts of London where they are located, particularly the Bloomsbury/Euston and Strand university precincts
 - c) work with developers, businesses and, where appropriate, higher education institutions and other relevant research and innovation agencies to ensure

availability of a range of workspaces, including start-up space, co-working space and 'grow-on' space

- d) support the development of green enterprise districts such as that proposed in the Thames Gateway
- e) promote clusters of research and innovation as focal points for research and collaboration between businesses, HEIs, other relevant research and innovation agencies and industry
- f) support the evolution of London's science, technology, media and telecommunications (TMT) sector, promote clusters such as Tech City and Med City1 ensuring the availability of suitable workspaces including television and film studio capacity.

37. Policy 4.11 of the London Plan states:

Encouraging A Connected Economy

Strategic

A. The Mayor and the GLA Group will, and all other strategic agencies should:

- a) facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals
- b) support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.

38. Policy 4.12 of the London Plan states:

Improving Opportunities For All

Strategic

A. Working with strategic partners, principally the London Enterprise Partnership, the Mayor will provide the spatial context to co-ordinate the range of national and local initiatives necessary to improve employment opportunities for Londoners, to remove barriers to employment and progression and to tackle low participation in the labour market.

Planning decisions

B. Strategic development proposals should support local

Saved UDP

39. Policy LE2 of the Saved UDP states:

Le2 industrial and business areas (ibas) are designated for business, industrial and warehousing purposes (use classes b1-b8) and for sui generis uses appropriate in an industrial area. The local planning authority will not permit development for other uses in industrial and business areas unless it is satisfied that: -

- (i) there is no realistic prospect of the land being used for Industrial or warehousing purposes in the future; and
- (ii) the proposed alternative use does not conflict with the Policies and objectives of the plan.
- (iii) the proposal better meets the plan's objectives Particularly in relation to affordable housing and Economic regeneration.

LPP1

40. Strategic objective S016 of the LLP1 states:

Manage appropriate growth, viability and regeneration of town and neighbourhood centres.

LPP2

41. Policy DME1 of the LLP2 states:

Employment Uses on Designated Employment Sites

- A) The Council will support employment proposals in Strategic Industrial Locations (SILs) - Preferred Industrial Locations (PIL) or Industrial Business Parks (IBP) - in accordance with relevant policies in the London Plan.
- B) The Council will support industrial and warehousing uses (Use Classes B1 (c), B2 and B8) and Sui Generis uses that are appropriate in an industrial area within Locally Significant Industrial Sites (LSIS).
- C) The Council will support light industrial, office and research & development activities (B1 (a) (b) (c) Use Classes) within Locally Significant Employment Locations (LSEs).
- D) Proposals for other uses will be acceptable in SILs LSEs and on LSIS only where:
 - i) There is no realistic prospect of the land being used for industrial or warehousing purposes in the future; and
 - ii) Sites have been vacant and consistently marketed for a period of 2 years; and
 - iii) The proposed alternative use does not conflict with the policies and objectives of this Plan.
- E) Development adjacent to SILs, LSIS and LSEs must be located and/or designed so as to not to compromise the integrity or operation of these employment areas.
- F) Proposals for small scale ancillary development which supports occupiers and the workforce on designated employment sites, such as 'walk to' services including workplace crèches, cafes and small scale food outlets, will be considered on a case by case basis supported.

SUPPORTING USES**London Plan**

42. Paragraph 2.15 of the London Plan states:

With the scale of growth expected in London, places with the scope for accommodating new homes and jobs will be of particular importance. The Mayor supports the development of the two growth areas designated by national Government and which fall partly within London – the Thames Gateway and the London-Stansted-Cambridge-Peterborough growth area. He will work with relevant

LPP1

Policy E5 of the LPP1 states:

Town and Local Centres

The Council will accommodate additional retail growth in established centres, in accordance with the conclusions of the latest evidence base. Growth for comparison goods will be primarily accommodated in District Centres as set out in Table 5.5. If appropriate, specific locations for growth in convenience goods will be determined through the production of the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document.

Planning decisions will be taken in accordance with the provisions of national guidance, particularly the sequential and impact tests. Further, more detailed policies will be outlined in the forthcoming Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document.

The Council will improve town and neighbourhood centres across Hillingdon as set out in Map 5.3, and improve public transport, walking and cycling connections to town and neighbourhood centres whilst ensuring an appropriate level of parking provision is provided for accessibility to local services and amenities. Public transport will be improved to strengthen the viability and vitality of all town centres across the borough.

Local parades will be protected, enhanced and managed to ensure they meet the needs of the local community and enhance the quality of life for local residents, particularly those without access to a car.

LPP2

Policy SA 5 Allocation of the LPP2 states:

Land to the South of the Railway, including Nestlé Site

This is an important strategic site for Hayes town and the Borough as a whole. The Council will support proposals that meet the following criteria:

Site A

- The provision of up to 500 units. Densities higher than 80 uph may be acceptable subject to high quality design. Higher density development should be located along the canal frontage.
- A minimum of 20 % of the site (2.4 ha) should be used for employment generating uses. Suitable uses will include B1 and elements of B2 that are compatible with the residential elements of the scheme.
- Small scale commercial uses to support residential uses will be considered suitable.
- 10% of the site (1.2 hectares) should be used for open space and a sports pitch;
- Education facilities; and
- The provision of community facilities, including a public park.
- Proposals should include a heritage assessment which considers the retention and reuse of Locally Listed structures on this site.

- Proposals should include high quality design that fully integrates the Grand Union Canal, ensures canal-side improvements and maximises the canal's recreational potential.
- Development should contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network

Sites B and C

- The provision of up to 97 residential units on Site B and 110 residential units on Site C. Proposals should be consistent with the PTAL rating and take account of lower suburban densities to the south; and
- A minimum of 50% of each site should contain employment generating uses including B1 office, and suitable B2 light industrial.

As a preference Sites A, and B and C should form a comprehensive development scheme across the whole site, and which:

- Sustains and enhances the significance of the heritage assets;
- Provides pedestrian links to Hayes Town Centre and key transport nodes; and
- Reflects the Council's latest evidence of housing need in terms of the type and tenure of residential units.

HERITAGE

NPPF

43. Paragraph 126 of the NPPF states:

Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution

44. Paragraph 128 of the NPPF states:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require

developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

45. Paragraph 134 of the NPPF states:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

46. Paragraph 135 of the NPPF states:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

47. Paragraph 136 of the NPPF states:

Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

London Plan

48. Policy 7.4 of the London Plan states:

Local Character

Strategic

A. Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

B. Buildings, streets and open spaces should provide a high quality design response that:

- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- e) is informed by the surrounding historic environment.

LDF preparation

C. Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that

character should be sustained, protected and enhanced through managed change. Characterisation studies can help in the process.

49. Policy 7.8 of the London Plan states:

Heritage Assets And Archaeology

Strategic

- A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

- C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

LDF preparation

- F. Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.
- G. Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

Saved UDP

50. Policy BE4 of the Saved UDP states:

New development within or on the fringes of conservation areas will be expected to preserve or enhance those features which contribute to their special architectural and visual qualities; development should avoid the demolition or loss of such features. There will be a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area. Applications for planning permission should contain full details, including siting and design, or replacement buildings. Applications for consent for demolition will depend upon the submission and approval of such details.

LPP1

51. Strategic Objective SO1 of the LLP1 states:

Conserve and enhance the borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

52. Policy HE1 of the LPP1 states:

The Council will:

1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes:

- Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features;
- Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;
- Registered Parks and Gardens and historic landscapes, both natural and designed;
- Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and
- Archaeologically significant areas, including Archaeological Priority Zones and Areas.

2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.

3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.

4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.

LLP2

53. Policy DMHB1 of the LLP2 states:

Heritage Assets

- A. Development that has an effect on heritage assets will only be supported where:
- i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
 - ii) it will not lead to substantial harm or total loss of significance without providing substantial public benefit that outweighs the harm or loss;
 - iii) it makes a positive contribution to the local character and distinctiveness of the area;
 - iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
 - v) the proposals would relate appropriately in terms of siting, style, scale, massing, height, design and materials;
 - vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and

vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

- B. Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.
- C. The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action,

54. Policy DMHB 3 of the LLP2 states:

Locally Listed Buildings

- A. There is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.
- B. Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.
- C. Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.

55. Policy DMHB 4 of the LLP2 states:

Policy Conservation Areas

New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:

- A. Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.
- B. Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.
- C. Proposals will be required to support the implementation of improvement actions set out in relevant Conservation Area Appraisals and Management Plans.

56. Policy DMHB 9 of the LPP2 states:

War Memorials

War memorials and, their wider settings will be protected, and there is a general presumption in favour of their retention in situ. They should be well maintained and their alteration, removal or sensitive relocation will only be considered when fully justified within a Heritage Statement.

TRANSPORT AND PARKING

NPPF

57. Paragraph 32 of the NPPF states:

All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

58. Paragraph 35 of the NPPF states:

Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to

- accommodate the efficient delivery of goods and supplies;
- give priority to pedestrian and cycle movements, and have access to highquality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
- consider the needs of people with disabilities by all modes of transport.

London Plan

59. Policy 2.8 of the London Plan states:

Outer London: Transport

Strategic

A. The Mayor will, and boroughs and other stakeholders should, recognise and address the distinct orbital, radial and qualitative transport needs of outer London in the context of those of the city region as a whole by:

- a) enhancing accessibility by improving links to and between town centres and other key locations by different modes and promoting and realising the improvements to the rail network set out in Policy 6.4 and the Mayor's Transport Strategy

- b) integrating land use and transport planning in outer London to ensure the use of vacant and under-used land is optimised
- c) ensuring that the rail, bus and other transport networks function better as integrated systems and better cater for both orbital and radial trips, for example through the provision of strategic interchanges
- d) improving the quality, lighting and security of stations to agreed quality standards
- e) supporting park and ride schemes where appropriate
- f) working to improve public transport access to job opportunities in the Outer Metropolitan Area, supporting reverse commuting, and enhancing the key role played by efficient bus services in outer London
- g) encouraging greater use of cycling and walking as modes of choice in outer London
- h) more active traffic management, including demand management measures; road improvements to address local congestion; car parking policy and guidance which reflects greater dependence on the private car; closer co-ordination of transport policy and investment with neighbouring authorities beyond London; and greater recognition of the relationship between office development and car use
- i) maximising the development opportunities supported by Crossrail.

60. Policy 6.1 of the London Plan states:

Strategic Approach

Strategic

- A. The Mayor will work with all relevant partners to encourage the closer integration of transport and development through the schemes and proposals shown in Table 6.1 and by:
 - a) encouraging patterns and nodes of development that reduce the need to travel, especially by car – boroughs should use the standards set out in Table 6.2 in the Parking Addendum to this chapter to set maximum car parking standards in DPDs
 - b) seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand – boroughs should use the standards set out in Table 6.3 in the Parking Addendum to set minimum cycle parking standards in DPDs
 - c) supporting development that generates high levels of trips at locations with high levels of public transport accessibility and/or capacity, either currently or via committed, funded improvements including, where appropriate, those provided by developers through the use of planning obligations (See Policy 8.2).
 - d) improving interchange between different forms of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London (see Policy 2.3)
 - e) seeking to increase the use of the Blue Ribbon Network, especially the Thames, for passenger and freight use
 - f) facilitating the efficient distribution of freight whilst minimising its impacts on the transport network
 - g) supporting measures that encourage shifts to more sustainable modes and appropriate demand management
 - h) promoting greater use of low carbon technology so that carbon dioxide and other contributors to global warming are reduced
 - i) promoting walking by ensuring an improved urban realm
 - j) seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable

- B. The Mayor will, and boroughs should, take an approach to the management of streetspace that takes account of the different roles of roads for neighbourhoods and road users in ways that support the policies in this Plan promoting public transport and other sustainable means of transport (including policies 6.2, 6.7, 6.9 and 6.10) and a high quality public realm. Where appropriate, a corridor-based approach should be taken to ensure the needs of street users and improvements to the public realm are co-ordinated.

61. Policy 6.3 of the London Plan states:

Assessing Effects Of Development On Transport Capacity

Planning decisions

- A. Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.
- B. Where existing transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans exist for an increase in capacity to cater for this, boroughs should ensure that development proposals are phased until it is known these requirements can be met, otherwise they may be refused. The cumulative impacts of development on transport requirements must be taken into account.
- C. Transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance for major planning applications. Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan1 and should be co-ordinated with travel plans.

LDF preparation

- D. Boroughs should take the lead in exploiting opportunities for development in areas where appropriate transport accessibility and capacity exist or is being introduced. Boroughs should facilitate opportunities to integrate major transport proposals with development in a way that supports London Plan priorities.
- E. LDFs should include policies requiring transport assessments, travel plans, construction logistics and delivery/servicing plans as set out in C above.

62. Policy 6.9 of the London Plan states:

Cycling

Strategic

- A. A The Mayor will work with all relevant partners to bring about a significant increase in cycling in London, so that it accounts for at least 5 per cent of modal share by 2026. He will:
 - a) identify, promote and implement a network of cycle routes across London which will include Cycle Superhighways and Quietways
 - b) continue to operate and improve the cycle hire scheme
 - c) fund the transformation of up to four outer London borough town centres into cycle friendly 'mini-Hollands'.

Planning decisions

B. Developments should:

- a) provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards (or subsequent revisions)
- b) provide on-site changing facilities and showers for cyclists
- c) contribute positively to an integrated cycling network for London by providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable and in line with the guidance set out in the London Cycle Design Standards (or subsequent revisions)
- d) provide links to existing and planned cycle infrastructure projects including Cycle Superhighways, Quietways, the Central London Grid and the 'mini-Hollands'
- e) facilitate the Mayor's cycle hire scheme through provision of land and/or planning obligations where relevant, to ensure the provision of sufficient capacity.

LDF preparation

C. DPDs should:

- a) identify, promote and facilitate the completion of relevant sections of cycle routes including Cycle Superhighways, Quietways and the Central London Grid and local borough routes, in light of guidance from TfL
- b) identify and safeguard sites for new or expanded cycle docking stations to increase capacity of the Mayor's cycle hire scheme in areas of high usage or operational stress
- c) identify and implement safe and convenient direct cycle routes to town centres, transport nodes and other key uses such as schools
- d) implement secure cycle parking facilities in line with the minimum standards set out in Table 6.3 or implement their own cycle parking standards to provide higher levels of provision.

63. Policy 6.13 of the London Plan states:

Parking

Strategic

- A. The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- B. The Mayor supports Park and Ride schemes in outer London where it can be demonstrated they will lead to overall reductions in congestion, journey times and vehicle kilometres.

Planning decisions

- C. The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be the basis for considering planning applications (also see Policy 2.8), informed by policy and guidance below on their application for housing in parts of Outer London with low public transport accessibility (generally PTALs 0-1).
- D. In addition, developments in all parts of London must:
 - a) ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
 - b) provide parking for disabled people in line with Table 6.2
 - c) meet the minimum cycle parking standards set out in Table 6.3

- d) provide for the needs of businesses for delivery and servicing.

LDF preparation

E.

- a) a the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in DPDs.
- b) b in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people)
- c) c in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole
- d) d outer London boroughs wishing to promote a more generous standard for office developments would need to take into account in a DPD
- a regeneration need
 - no significant adverse impact on congestion or air quality
 - a lack (now and in future) of public transport
 - a lack of existing on or off street parking
 - a commitment to provide space for electric and car club vehicles, bicycles and parking for disabled people above the minimum thresholds
 - a requirement, via Travel Plans, to reduce provision over time.
- e) e Outer London boroughs should demonstrate that they have actively considered more generous standards for housing development in areas with low public transport accessibility (generally PTALs 0-1) and take into account current and projected pressures for on-street parking and their bearing on all road users, as well as the criteria set out in NPPF (para 39).

Saved UDP

64. Policy AM2 of the Saved UDP states:

All proposals for development will be assessed against:

- (i) their contribution to traffic generation and their impact on congestion, particularly on the principal road network as defined in paragraph 14.14 of the plan, and
- (ii) the present and potential availability of public transport, and it's capacity to meet increased demand.

LPP1

65. Policy T1 of the LPP1 states:

Accessible Local Destinations

The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.

The Council will ensure access to local destinations which provide services and amenities. The Council will promote active travel through improvements to Hillingdon's public rights of way.

66. Strategic Objective SO12 of the LPP1 states:

Reduce the reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans.

LLP2

67. Policy DMT1 states

Managing Transport Impacts

- A. Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:
- i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;
 - ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
 - iii) provide equal access for all people, including inclusive access for disabled people;
 - iv) adequately address delivery, servicing and drop-off requirements;
 - and
 - v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.
- B. Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the thresholds set out in Table 8.1 and any subsequent update to these thresholds. All major developments¹⁴ that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

68. Policy DMT2 of the LPP2 states:

Highways Impacts

- A. Development proposals must ensure that:
- i) safe and efficient vehicular access to the highway network is provided to the Council's standards;
 - ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;
 - iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;
 - iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and
 - v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.

69. Policy DMT4 of the LPP2 states:

Public Transport

- A. The Council will support and promote the enhancement of public transport facilities, including at key interchanges that address the needs of the Borough. The Council may

require developers to mitigate transport impacts from development proposals by improving local public transport facilities and services, which may include:

- i) improvements to address inclusive access;
- ii) ensuring that bus stops are conveniently located for passengers;
- iii) implementation of bus priority and bus stop accessibility measures;
- iv) providing for bus route requirements and associated road layouts;
- v) improvements to the network of services; and
- vi) improvements to infrastructure to support cycling.

B. Public transport measures may be required to be included in the highways layout design where they are identified in a transport assessment, travel plan or integral to the acceptability of the proposal.

70. Policy DMT5 of the LPP2 states:

Pedestrians and cyclists

A. Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:

- i) the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;
- ii) the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;
- iii) the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and
- iv) the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 or, in agreement with Council.

B. Development proposals located next to or along the Blue Ribbon network will be required to enhance and facilitate inclusive, safe and secure pedestrian and cycle access to the network. Development proposals, by virtue of their design, will be required to complement and enhance local amenity and include passive surveillance to the network.

71. Policy DMT6 of the LPP2 states:

Vehicle Parking

A. Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when:

- i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or
- ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.

B. All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

DESIGN AND TALL BUILDINGS

NPPF

72. Paragraph 17 of the NPPF states:

Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;
- not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

73. Paragraph 56 of the NPPF states:

The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

74. Paragraph 60 of the NPPF states:

Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

75. Paragraph 61 of the NPPF states:

Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

London Plan

76. Policy 3.5 of the London Plan states:

Quality And Design Of Housing Developments

Strategic

- A. Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

Planning decisions and LDF preparation

- B. The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- C. LDFs should incorporate requirements for accessibility and adaptability, minimum space standards including those set out in Table 3.3, and water efficiency. The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process⁴.
- D. Development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.

- E. The Mayor will provide guidance on implementation of this policy that is relevant to all tenures.

77. Policy 5.3 of the London Plan states:

Sustainable Design And Construction

Strategic

- A. The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

Planning decisions

- B. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- C. Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:
 - a) minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)
 - b) avoiding internal overheating and contributing to the urban heat island effect
 - c) efficient use of natural resources (including water), including making the most of natural systems both within and around buildings
 - d) minimising pollution (including noise, air and urban runoff)
 - e) minimising the generation of waste and maximising reuse or recycling
 - f) avoiding impacts from natural hazards (including flooding)
 - g) ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions
 - h) securing sustainable procurement of materials, using local supplies where feasible, and
 - i) promoting and protecting biodiversity and green infrastructure.

LDF preparation

- D. Within LDFs boroughs should consider the need to develop more detailed policies and proposals based on the sustainable design principles outlined above and those which are outlined in the Mayor's supplementary planning guidance that are specific to their local circumstances.

78. Policy 7.1 of the London Plan states:

Lifetime Neighbourhoods

Strategic

- A. In their neighbourhoods, people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhoods principles set out in paragraph 7.4A.

Planning decisions

- B. Development should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment and training opportunities, commercial services and public transport.
- C. Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods.
- D. The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.
- E. The policies in this chapter provide the context within which the targets set out in other chapters of this Plan should be met.

LDF preparation

- F. Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate.
- G. Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms.

79. Policy 7.4 of the London Plan states:

Local Character

Strategic

- A. Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

- B. Buildings, streets and open spaces should provide a high quality design response that:
 - a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
 - b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
 - c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
 - d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
 - e) is informed by the surrounding historic environment.

LDF preparation

- C. Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

80. Policy 7.5 of the London Plan states:

Public Realm

Strategic

- A. London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Planning decisions

- B. Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.
- C. Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate. Development should also reinforce the connection between public spaces and existing local features such as the Blue Ribbon Network and parks and others that may be of heritage significance.

LDF preparation

- D. D Boroughs should develop local objectives and programmes for enhancing the public realm, ensuring it is accessible for all, with provision for sustainable management and reflects the principles in Policies 7.1, 7.2, 7.3 and 7.4.

81. Policy 7.6 of the London Plan states:

Architecture

Strategic

- A. Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

Planning decisions

- B. B Buildings and structures should:
 - a) be of the highest architectural quality
 - b) be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
 - c) comprise details and materials that complement, not necessarily replicate, the local architectural character

- d) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for buildings.
- e) incorporate best practice in resource management and climate change mitigation and adaptation
- f) provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g) be adaptable to different activities and land uses, particularly at ground level
- h) meet the principles of inclusive design
- i) optimise the potential of sites

82. Policy 7.7 of the London Plan states:

Location And Design Of Tall And Large Buildings

Strategic

- A. Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.

Planning decisions

- B. Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria below. This is particularly important if the site is not identified as a location for tall or large buildings in the borough's LDF.
- C. Tall and large buildings should:
 - a) generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport
 - b) only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building
 - c) relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
 - d) individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London
 - e) incorporate the highest standards of architecture and materials, including sustainable design and construction practices
 - f) have ground floor activities that provide a positive relationship to the surrounding streets
 - g) contribute to improving the permeability of the site and wider area, where possible
 - h) incorporate publicly accessible areas on the upper floors, where appropriate
 - i) make a significant contribution to local regeneration.
- D. Tall buildings:
 - a) a should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference
 - b) b should not impact on local or strategic views adversely

- E. The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings.

LDF preparation

- E. Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks. These areas should be consistent with the criteria above and the place shaping and heritage policies of this Plan.

Saved UDP

83. Policy BE14 of the Saved UDP states:

Permission will not be granted for the development of sites in isolation if the design fails to safeguard the satisfactory re-development of adjoining sites which have development potential.

84. Policy BE19 of the Saved UDP states:

The local planning authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area.

85. Policy BE20 of the Saved UDP states:

Buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded.

86. Policy BE21 of the saved UDP states:

Planning permission will not be granted for new buildings or extensions which by reason of their siting, bulk and proximity, would result in a significant loss of residential amenity.

87. Policy BE22 of the Saved UDP states:

Residential extensions and buildings of two or more storeys in height should be set back a minimum of 1 metre (1.5 metre in the Copsewood and gate hill farm estates, Northwood and the drive, Ickenham) from the side boundary of the property for the full height of the building.

88. Policy BE23 of the Saved UDP states:

New residential buildings or extensions should provide or maintain external amenity space which is sufficient to protect the amenity of the occupants of the proposed and surrounding buildings, and which is usable in terms of its shape and siting.

89. Policy BE24 of the Saved UDP states:

The design of new buildings should protect the privacy of the occupiers and their neighbours.

LPP1

90. Policy BE1 of the LPP1 states:

Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;
2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;
3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;
4. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);
5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;
6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;
8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;
9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;
10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction

techniques to increase the re-use and recycling of construction demolition and excavation waste and reduce the amount disposed to landfill;

11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape. Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies.

LPP2

91. Policy DMHB 10 states:

High Buildings and Structures

Any proposal for a high buildings or structure will be required to respond to the local dominant context and satisfy the criteria listed below.

It should:

- i) be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings;
- ii) be located in an area of high public transport accessibility and be fully accessible for all users;
- iii) be of a height, form, massing and scale footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views;
- iv) achieve high architectural quality and include design innovation. Consideration should be given to its silhouette, so that it provides a positive contribution to the skyline, its design at street level, facing materials and finishes, lighting and night time impact.
- v) where residential uses are proposed, include high quality and useable private and communal amenity space and ensure an innovative approach to the provision of open space;
- vi) not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces;
- vii) be well managed, provide positive social and economic benefits and contribute to socially balanced and inclusive communities;
- viii) comply with aviation and navigation requirements and not adversely impact upon telecommunication, television and radio transmission networks; and
- ix) demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes.

92. Policy DMHB 11 of the LPP2 states:

Design of New Development

- A. All development, including extensions, alterations and new buildings will be required to be designed to the highest quality 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.
- B. Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- C. Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
- 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.

RESIDENTIAL QUALITY

London Plan

93. Policy 3.5 of the London Plan states:

Quality And Design Of Housing Developments

Strategic

- A. Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

Planning decisions and LDF preparation

- B. The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- C. LDFs should incorporate requirements for accessibility and adaptability, minimum space standards including those set out in Table 3.3, and water efficiency. The Mayor will, and boroughs should, seek to ensure that new development reflects these

standards. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process.

- D. Development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.
- E. The Mayor will provide guidance on implementation of this policy that is relevant to all tenures.

94. Policy 3.8 of the London Plan states:

Housing Choice

Strategic

- A. Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

LDF preparation and planning decisions

- B. To inform local application of Policy 3.3 on housing supply and taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:
 - a) new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these
 - b) the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery
 - c) provision of affordable family housing is addressed as a strategic priority in LDF policies
 - d) ninety percent of new housing¹ meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'
 - e) ten per cent of new housing² meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users
 - f) account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision
 - g) account is taken of the needs of particular communities with large families
 - h) other supported housing needs are identified authoritatively and co-ordinated action is taken to address them in LDF and other relevant plans and strategies
 - i) strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.
 - j) the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.

- k) appropriate provision is made for the accommodation of service families and custom build, having regard to local need.

1 Unlike the other standards in this Plan, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use. Additional guidance on the applicable requirements of the Building Regulations (amended 2015) can be found in: Approved Document M Access to and use of buildings Volume 1: Dwellings.

2 *ibid*

Saved UDP

95. Policy BE19 of the Saved UDP states:

The local planning authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area.

96. Policy BE20 of the Saved UDP states:

Buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded.

97. Policy BE23 of the Saved UDP states:

New residential buildings or extensions should provide or maintain external amenity space which is sufficient to protect the amenity of the occupants of the proposed and surrounding buildings, and which is usable in terms of its shape and siting.

98. Policy BE24 of the Saved UDP states:

The design of new buildings should protect the privacy of the occupiers and their neighbours.

LPP2

99. Policy DMHB 11 of the LPP2 states:

Design of New Development

- A. All development, including extensions, alterations and new buildings will be required to be designed to the highest quality 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.
- B. Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- C. Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
- 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.

100. Policy DMBH 16 of the LPP2 states:

Housing Standards

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.;

RESIDENTIAL MIX

NPPF

101. Paragraph 9 of the NPPF states:

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of bio-diversity to achieving net gains for nature;⁶
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

London Plan

102. Policy 3.8 of the London Plan states:

Housing Choice

Strategic

- A. Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

LDF preparation and planning decisions

- B. To inform local application of Policy 3.3 on housing supply and taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:
- a) new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these
 - b) the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery
 - c) provision of affordable family housing is addressed as a strategic priority in LDF policies
 - d) ninety percent of new housing¹ meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'
 - e) ten per cent of new housing² meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users
 - f) account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision
 - g) account is taken of the needs of particular communities with large families
 - h) other supported housing needs are identified authoritatively and co-ordinated action is taken to address them in LDF and other relevant plans and strategies
 - i) strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.
 - j) the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.
 - k) appropriate provision is made for the accommodation of service families and custom build, having regard to local need.

103. Policy 3.9 of the London Plan states:

Mixed And Balanced Communities

Strategic

- A. Communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment.
- B. A more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation

Saved UDP

104. Policy H4 of the Saved UDP states:

Wherever practicable a mix of housing units of different sizes should be provided in schemes of residential development including in particular units of one or two bedrooms. Within town centres predominantly one and two bedroom development will be preferable.

LPP2

105. Policy DMH2 of the LPP2 states:

Housing Mix

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.

RESIDENTIAL DENSITY**London Plan**

106. Policy 3.4 of the London Plan states:

Optimising Housing Potential

Strategic, LDF preparation and planning decisions

- A. Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.

107. Paragraph 3.28 of the London Plan states:

A rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6). These broad ranges also provide the framework within which boroughs can refine local approaches to implementation of this strategic policy through their LDFs⁵⁶. Where appropriate, they can also provide a tool for increasing density in situations where transport proposals will improve public transport accessibility in the future. It is important that higher density housing is not automatically seen as requiring high rise development.

LPP1

108. Paragraph 6.23 of the LPP1 states:

High quality design for new homes will continue to be a priority for the Council and the type of dwellings provided should reflect housing needs identified in the borough, particularly the need to provide more family homes with adequate garden space. Further policy guidance on the type of dwellings required in Hillingdon will be contained in the Hillingdon Local Plan: Part 2- Development Management Policies LDD. The density of

residential development should take account of the need to optimise the potential of sites compatible with local and historic context, while respecting the quality, character and amenity of surrounding uses. The density and design of residential development will be addressed through the provision of appropriate policies in the emerging Hillingdon Local Plan: Part 2- Development Management Policies LDD.

LPP2

109. Policy DMHB 17 of the LPP2 states:

Residential Density

All new residential development should take account of the Residential Density Matrix contained in Table 5.3. Developments will be expected to meet habitable rooms standards.

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)			
Setting	Public Transport Accessibility Level (PTAL)	Setting	Public Transport Accessibility Level (PTAL)
	0 to 1	2 to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
Urban	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
Central	150–300 hr/ha	300–650 hr/ha	650–1100 hr/ha
3.8–4.6 hr/unit	35–80 u/ha	65–170 u/ha	140–290 u/ha
3.1–3.7 hr/unit	40–100 u/ha	80–210 u/ha	175–355 u/ha
2.7–3.0 hr/unit	50–110 u/hr	100–240 u/ha	215–405 u/ha

DAYLIGHT/SUNLIGHT

London Plan

110. Policy 7.6 of the London Plan states:

Architecture

Strategic

- A. Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

Planning decisions

- B. Buildings and structures should:
- a) be of the highest architectural quality
 - b) be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
 - c) comprise details and materials that complement, not necessarily replicate, the local architectural character
 - d) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.

Saved UDP

111. Policy BE20 of the Saved UDP states:

Buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded.

LPP2

Policy DMHB 11 states:

Design of New Development

- A. All development, including extensions, alterations and new buildings will be required to be designed to the highest quality 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.

- B. Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- C. Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
- 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.

ENERGY

NPPF

112. Paragraph 95 of the NPPF states:

To support the move to a low carbon future, local planning authorities should:

- plan for new development in locations and ways which reduce greenhouse gas emissions;
- actively support energy efficiency improvements to existing buildings; and
- when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards.

113. Paragraph 96 of the NPPF states:

In determining planning applications, local planning authorities should expect new development to:

- comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

114. Paragraph 97 of the NPPF states:

To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:

- have a positive strategy to promote energy from renewable and low carbon sources;
- design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;¹⁷

- support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and
- identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

115. Paragraph 98 of the NPPF states:

When determining planning applications, local planning authorities should:

- not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
- approve the application¹⁸ if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should also expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

London Plan

116. Policy 5.2 of the London Plan states:

Minimising Carbon Dioxide Emissions

Planning decisions

- A. Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- 1 Be lean: use less energy
 - 2 Be clean: supply energy efficiently
 - 3 Be green: use renewable energy
- B. The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.

Residential buildings:

Non-domestic buildings:

Year Improvement on 2010 Building Regulations

2010 – 2013 25 per cent (Code for Sustainable Homes level 4)t

2013 – 2016 40 per cent

2016 – 2031 Zero Carbon

Non-domestic buildings:

Year Improvement on 2010 Building Regulations

2010 – 2013 25 per cent

2013 – 2016 40 per cent

2016 – 2019 As per building regulations requirements

2019 - 2031 Zero Carbon

- C. Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.

- D. As a minimum, energy assessments should include the following details:
- a) calculation of the energy demand and carbon dioxide emissions covered by Building Regulations and, separately, the energy demand and carbon dioxide emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (see paragraph 5.22) at each stage of the energy hierarchy
 - b) proposals to reduce carbon dioxide emissions through the energy efficient design of the site, buildings and services
 - c) proposals to further reduce carbon dioxide emissions through the use of decentralised energy where feasible, such as district heating and cooling and combined heat and power (CHP)
 - d) proposals to further reduce carbon dioxide emissions through the use of on-site renewable energy technologies.
- E. The carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced

117. Policy 5.5 of the London Plan states:

Decentralised Energy Networks

Strategic

- A. The Mayor expects 25 per cent of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. In order to achieve this target the Mayor prioritises the development of decentralised heating and cooling networks at the development and area wide levels, including larger scale heat transmission networks.

LDF preparation

- B. Within LDFs boroughs should develop policies and proposals to identify and establish decentralised energy network opportunities. Boroughs may choose to develop this as a supplementary planning document and work jointly with neighbouring boroughs to realise wider decentralised energy network opportunities. As a minimum boroughs should:
- a) identify and safeguard existing heating and cooling networks
 - b) identify opportunities for expanding existing networks and establishing new networks. Boroughs should use the London Heat Map tool and consider any new developments, planned major infrastructure works and energy supply opportunities which may arise
 - c) develop energy master plans for specific decentralised energy opportunities which identify:
 - a. major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
 - b. major heat supply plant
 - c. possible opportunities to utilise energy from waste
 - d. possible heating and cooling network routes
 - e. implementation options for delivering feasible projects, considering issues of procurement, funding and risk and the role of the public sector
 - d) require developers to prioritise connection to existing or planned decentralised energy networks where feasible.

118. Policy 5.6 of the London Plan states:

Decentralised Energy In Development Proposals

Planning decisions

- A. Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.
- B. Major development proposals should select energy systems in accordance with the following hierarchy:
 - 1 Connection to existing heating or cooling networks;
 - 2 Site wide CHP network;
 - 3 Communal heating and cooling;
- C. Potential opportunities to meet the first priority in this hierarchy are outlined in the London Heat Map tool. Where future network opportunities are identified, proposals should be designed to connect to these networks.

119. Policy 5.7 of the London Plan states:

Renewable Energy

Strategic

- A. The Mayor seeks to increase the proportion of energy generated from renewable sources, and expects that the projections for installed renewable energy capacity outlined in the Climate Change Mitigation and Energy Strategy and in supplementary planning guidance will be achieved in London.

Planning decisions

- B. Within the framework of the energy hierarchy (see Policy 5.2), major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

LDF preparation

- C. Within LDFs boroughs should, and other agencies may wish to, develop more detailed policies and proposals to support the development of renewable energy in London – in particular, to identify broad areas where specific renewable energy technologies, including large scale systems and the large scale deployment of small scale systems, are appropriate. The identification of areas should be consistent with any guidelines and criteria outlined by the Mayor.
- D. All renewable energy systems should be located and designed to minimise any potential adverse impacts on biodiversity, the natural environment and historical assets, and to avoid any adverse impacts on air quality.

LPP1

120. Policy EM1 of the LPP1 states:

Climate Change Adaptation and Mitigation

The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.
5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.
7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.
8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.
9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate.

The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:

10. Locating and designing development to minimise the probability and impacts of flooding.
11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.
12. Giving preference to development of previously developed land to avoid the loss of further green areas.
13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks.
14. Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects.

LPP2

121. Policy DMEI 2 of the LPP2 states:

Reducing Carbon Emissions

- A. All developments are required to 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 of £/tonne over the lifetime of the development, in accordance with the current 'allowable solutions cost'.

122. Policy DMEI 3 of the LPP2 states:

Decentralised Energy

- A. All major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN).
- B. Major developments located within 500 metres of an existing DEN, and minor new-build developments located within 100 metres, will be required to connect to that network, including provision of the means to connect to that network and a reasonable financial contribution to the connection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible.
- C. Major developments located within 500 metres of a planned future DEN, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be required to provide a means to connect to that network and developers shall provide a reasonable financial contribution for the future cost of connection and a commitment to connect via a legal agreement or contract, unless a feasibility assessment demonstrates that connection is not reasonably possible.
- D. The Council will support the development of networks DENs and energy centres in principle, subject to meeting the wider policy requirements

SUSTAINABILITY

NPPF

123. Paragraph 7 states:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

124. Paragraph 14 of the NPPF states:

At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.

For **plan-making** this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

For **decision-taking** this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

125. Paragraph 17 of the NPPF states:

Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;
- not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many

functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);

- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

London Plan

126. Policy 5.3 of the London Plan states:

Sustainable Design And Construction

Strategic

- A. The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

Planning decisions

- B. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- C. Major development proposals should meet the minimum standard outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:
- a) minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)
 - b) avoiding internal overheating and contributing to the urban heat island effect
 - c) efficient use of natural resources (including water), including making the most of natural systems both within and around buildings
 - d) minimising pollution (including noise, air and urban runoff)
 - e) minimising the generation of waste and maximising reuse or recycling
 - f) avoiding impacts from natural hazards (including flooding)
 - g) ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions
 - h) securing sustainable procurement of materials, using local supplies where feasible, and
 - i) promoting and protecting biodiversity and green infrastructure.

LDF preparation

- D. Within LDFs boroughs should consider the need to develop more detailed policies and proposals based on the sustainable design principles outlined above and those which are outlined in the Mayor's supplementary planning guidance that are specific to their local circumstances.

127. Policy 5.9 of the London Plan states:

Overheating And Cooling

Strategic

- A. The Mayor seeks to reduce the impact of the urban heat island effect in London and encourages the design of places and spaces to avoid overheating and excessive heat generation, and to reduce overheating due to the impacts of climate change and the urban heat island effect on an area wide basis.

Planning decisions

- B. Major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the following cooling hierarchy:
- 1 minimise internal heat generation through energy efficient design
 - 2 reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls
 - 3 manage the heat within the building through exposed internal thermal mass and high ceilings
 - 4 passive ventilation
 - 5 mechanical ventilation
 - 6 active cooling systems (ensuring they are the lowest carbon options).
- C. Major development proposals should demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs. New development in London should also be designed to avoid the need for energy intensive air conditioning systems as much as possible. Further details and guidance regarding overheating and cooling are outlined in the London Climate Change Adaptation Strategy.

LDF preparation

- D. Within LDFs boroughs should develop more detailed policies and proposals to support the avoidance of overheating and to support the cooling hierarchy.

128. Policy 5.17 of the London Plan states:

Waste Capacity

Strategic

- A. The Mayor supports the need to increase waste processing capacity in London. He will work with London boroughs and waste authorities to identify opportunities for introducing new waste capacity, including strategically important sites for waste management and treatment, and resource recovery parks/consolidation centres, where recycling, recovery and manufacturing activities can co-locate.

Planning decisions

- B. Proposals for waste management should be evaluated against the following criteria:
- a) locational suitability (see LDF preparation paragraphs F and G below)
 - b) proximity to the source of waste
 - c) the nature of activity proposed and its scale
 - d) minimising waste and achieving high reuse and recycling performance

- e) achieving a positive carbon outcome of waste treatment methods and technologies (including the transportation of waste, recyclates and waste derived products) resulting in greenhouse gas savings. Facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum CO₂eq performance of 400 grams of CO₂eq per kilowatt hour (kwh) of electricity produced. Achieving this performance will ensure that energy generated from waste activities is no more polluting in carbon terms than the energy source it replaces (see paragraph 5.85 below).
- f) the environmental impact on surrounding areas, particularly noise emissions, odour, air quality and visual impact and impact on water resources
- g) the full transport and environmental impact of all collection, transfer and disposal movements and, in particular, the scope to maximise the use of rail and water transport using the Blue RibbonNetwork.

The following will be supported:

- h) developments that include a range of complementary waste facilities on a single site
 - i) developments for manufacturing related to recycled waste
 - j) developments that contribute towards renewable energy generation, in particular the use of technologies that produce a renewable gas
 - k) developments for producing renewable energy from organic/ biomass waste.
- C. Wherever possible, opportunities should be taken to provide combined heat and power and combined cooling heat and power.
 - D. Developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use.
 - E. Suitable waste and recycling storage facilities are required in all new developments.

LDF preparation

- F. Boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in this Plan. Boroughs may wish to collaborate by pooling their apportionment requirements.
- G. Land to manage borough waste apportionments should be brought forward through:
 - a) protecting and facilitating the maximum use of existing waste sites, particularly waste transfer facilities and landfill sites
 - b) identifying sites in strategic industrial locations (see Policy 2.17)
 - c) identifying sites in locally significant employment areas (see Policy 4.4)
 - d) safeguarding wharves (in accordance with policy 7.26) with an existing or future potential for waste management.
- H. If, for any reason, an existing waste management site is lost to nonwasted use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.

LPP1

129. Policy BE1 of the LPP1 states:

Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;
2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;
3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;
4. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);
5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;
6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;
8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;
9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;
10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;
11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape. Support will be given for proposals that are consistent

with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies.

LANDSCAPE, AMENITY AND BIODIVERSITY

NPPF

130. Paragraph 9 of the NPPF states:

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of bio-diversity to achieving net gains for nature;⁶
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

131. Paragraph 109 of the NPPF states:

The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

London Plan

132. Policy 2.18 of the London Plan states:

Green Infrastructure: The Multi Functional Network Of Green And Open Spaces

Strategic

- A. The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure. This multifunctional network will secure benefits including, but not limited to, biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.
- B. The Mayor will pursue the delivery of green infrastructure by working in partnership with all relevant bodies, including across London's boundaries, as with the Green Arc Partnerships and Lee Valley Regional Park Authority. The Mayor has published supplementary guidance on the All London Green Grid to set out the strategic objectives and priorities for green infrastructure across London.

- C. In areas of deficiency for regional and metropolitan parks, opportunities for the creation of green infrastructure to help address this deficiency should be identified and their implementation should be supported, such as in the Wandle Valley Regional Park¹.

Planning decisions

- D. Enhancements to London's green infrastructure should be sought from development and where a proposal falls within a regional or metropolitan park deficiency area (broadly corresponding to the areas identified as "regional park opportunities" on Map 2.8), it should contribute to addressing this need.
- E. Development proposals should:
- incorporate appropriate elements of green infrastructure that are integrated into the wider network
 - encourage the linkage of green infrastructure including the Blue Ribbon Network, to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening (Policy 5.10).

LDF preparation

- F. Boroughs should:
- set out a strategic approach to planning positively for the creation, protection, enhancement and management of networks of green infrastructure by producing green infrastructure strategies that cover all forms of green and open space and the interrelationship between these spaces. These should identify priorities for addressing deficiencies and should set out positive measures for the design and management of all forms of green and open space. Delivery of local biodiversity action plans should be linked to these strategies.
 - ensure that in and through DPD policies, green infrastructure needs are planned and managed to realise the current and potential value of these to communities and to support delivery of the widest range of linked environmental and social benefits
 - in London's urban fringe support, through appropriate initiatives, the vision of creating and protecting an extensive and valued recreational landscape of well-connected and accessible countryside around London for both people and wildlife.

133. Policy 3.6 of the London Plan states:

Children And Young People's Play And Informal Recreation Facilities

Strategic

- A. The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible.

Planning decisions

- B. Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation sets out guidance to assist in this process.

LDF preparation

- C. Boroughs should:
- a) undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities
 - b) produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.

134. Policy 5.10 of the London Plan states:

Urban Greening

Strategic

- A. The Mayor will promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.
- B. The Mayor seeks to increase the amount of surface area greened in the Central Activities Zone by at least five per cent by 2030, and a further five per cent by 2050.

Planning decisions

- C. Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.

LDF preparation

- D. Boroughs should identify areas where urban greening and green infrastructure can make a particular contribution to mitigating the effects of climate change, such as the urban heat island.

¹ Mayor of London. Leading to a Greener London. GLA, 2009

135. Policy 7.4 of the London Plan states:

Local Character

Strategic

- A. Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

- B. Buildings, streets and open spaces should provide a high quality design response that:

- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- b) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
- d) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
- e) is informed by the surrounding historic environment.

LDF preparation

- C. Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in the process.

136. Policy 7.5 of the London Plan states:

Public Realm

Strategic

- A. London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Planning decisions

- B. Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.
- C. Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate. Development should also reinforce the connection between public spaces and existing local features such as the Blue Ribbon Network and parks and others that may be of heritage significance.

LDF preparation

- D. Boroughs should develop local objectives and programmes for enhancing the public realm, ensuring it is accessible for all, with provision for sustainable management and reflects the principals in Policies 7.1, 7.2, 7.3 and 7.4.

137. Policy 7.19 of the London Plan states:

Biodiversity And Access To Nature

Strategic

- A. The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.
- B. B Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1-2.17, 3.1, 3.3, 3.7, 5.4A, 5.14, 5.15, 5.17, 5.20, 6.3, 6.9, 7.14, 7.15, 7.25 – 7.27 and 8.1. Whilst all opportunity and intensification areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.

Planning decisions

- C. Development Proposals should:
 - a) wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity
 - b) prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites
 - c) not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.
- D. On Sites of Importance for Nature Conservation development proposals should:
 - a) give the highest protection to sites with existing or proposed international designations¹ (SACs, SPAs, Ramsar sites) and national designations² (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations³
 - b) give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance
 - c) give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.
- E. When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:
 - 1 avoid adverse impact to the biodiversity interest
 - 2 minimize impact and seek mitigation
 - 3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

LDF preparation

- F. In their LDFs, Boroughs should:
 - a) use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.
 - b) identify areas deficient in accessible wildlife sites and seek opportunities to address them
 - c) include policies and proposals for the protection of protected/ priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets

- d) ensure sites of European or National Nature Conservation

138. Policy 7.21 of the London Plan states:

Trees And Woodlands

Strategic

- A. Trees and woodlands should be protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework (or any successor strategy). In collaboration with the Forestry Commission the Mayor has produced supplementary guidance on Tree Strategies to guide each borough's production of a Tree Strategy covering the audit, protection, planting and management of trees and woodland. This should be linked to a green infrastructure strategy.

Planning decisions

- B. Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.

LDF preparation

- C. Boroughs should follow the advice of paragraph 118 of the NPPF to protect 'veteran' trees and ancient woodland where these are not already part of a protected site.
D. Boroughs should develop appropriate policies to implement their borough tree strategy.

139. Policy 7.24 of the London Plan states:

Blue Ribbon Network

Strategic

- A. The Blue Ribbon Network is a strategically important series of linked spaces. It should contribute to the overall quality and sustainability of London by prioritizing uses of the waterspace and land alongside it safely for water related purposes, in particular for passenger and freight transport. Regard should be paid to the Thames River Basin Management Plan and the emerging marine planning regime and the Marine Policy Statement.

140. Policy 7.27 of the London Plan states:

Blue Ribbon Network: Supporting Infrastructure And Recreational Use

Planning decisions

- A. A Development proposals should enhance the use of the Blue Ribbon Network, in particular proposals:
- a) that result in the loss of existing facilities for waterborne sport and leisure should be refused, unless suitable replacement facilities are provided
 - b) should protect and improve existing access points to (including from land into water such as slipways and steps) or alongside the Blue Ribbon Network (including paths). New access infrastructure into and alongside the Blue Ribbon Network will be sought.

- c) should protect and enhance waterway support infrastructure such as boatyards, moorings, jetties and safety equipment etc. New infrastructure to support water dependent uses will be sought. New mooring facilities should normally be off line from main navigation routes, ie in basins or docks.

LDF preparation

- B. Within LDFs boroughs should identify the location of waterway facilities and any opportunities for enhancing or extending facilities, especially within opportunity areas and other areas where a particular need has been identified.

141. Policy 7.28 of the London Plan states:

Restoration Of The Blue Ribbon Network

Planning decisions

- A. A Development proposals should restore and enhance the Blue Ribbon Network by:
 - a) taking opportunities to open culverts and naturalise river channels
 - b) increasing habitat value. Development which reduces biodiversity should be refused
 - c) preventing development and structures into the water space unless it serves a water related purpose (see paragraph 7.84).
 - d) protecting the value of the foreshore of the Thames and tidal rivers
 - e) resisting the impounding of rivers
 - f) protecting the open character of the Blue Ribbon Network.

LDF preparation

- B. Within LDFs boroughs should identify any parts of the Blue Ribbon Network where particular biodiversity improvements will be sought, having reference to the London River Restoration Action Plan (see paragraph 7.86).

Saved UDP

142. Policy BE23 of the Saved UDP states:

New residential buildings or extensions should provide or maintain external amenity space which is sufficient to protect the amenity of the occupants of the proposed and surrounding buildings, and which is usable in terms of its shape and siting.

143. Policy BE32 of the Saved UDP states:

When considering proposals for development adjacent to or having a visual effect on the grand union canal, the local planning authority will seek to ensure that every opportunity is taken to:

- (i) secure and where possible enhance the role of the canal and its immediate surrounds as a wildlife corridor;
- (ii) secure environmental improvements appropriate to waterside areas;
- (iii) ensure that buildings are of a design which complements the visual qualities of the canal in terms of scale, bulk, layout and materials;
- (iv) conserve buildings or features associated with the working life of the canal;
- (v) create new public access to the waterside and towpath linked to the footpath network in the surrounding area;

(vi) enhance or create views through and from the development, from and towards the watercourse; and

(vii) retain existing leisure moorings unless alternative provision is made in suitable locations.

LPP1

144. Strategic Objective SO3 of the LPP1 states:

Improve the quality of and accessibility to, the heritage value of the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest biodiversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Strategy.

145. Policy EM7 of the LPP1 states:

Biodiversity and Geological Conservation

The Council will review all the Borough grade Sites of Importance for Nature Conservation (SINCs). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.

Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:

1. The conservation and enhancement of the natural state of:
 - Harefield Gravel Pits
 - Colne Valley Regional Park
 - Fray's Farm Meadows
 - Harefield Pit
2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.
3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.
4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.
5. The provision of biodiversity improvements from all development, where feasible.
6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.
7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.

LPP2

146. Policy DMEI 1 of the LPP2 states:

Living Walls and Roofs and on-site Vegetation

All development proposals are required to comply with the following:

- i) All major development⁶ 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.

147. Policy DMEI 8 of the LPP2 states:

Waterside Development

- A. Development on sites that adjoin or include a watercourse should:
 - i) have regard to the relevant provisions of the Thames River Basin Management Plan and any other relevant Catchment Management Plans;
 - ii) not extend within 8 metres of the top of the bank of a main river or 5 metres either side of an ordinary watercourse or an appropriate width as may be agreed by the Council;
 - iii) where feasible, secure the implementation of environmental enhancements to open sections of river or watercourse; and
 - iv) where feasible, implement a scheme for restoring culverted sections of river or watercourses which must include an adequate buffer for flooding and maintenance purposes.
- B. Where on-site environmental enhancements or deculverting are financially viable but not feasible, the Council will seek a financial contribution towards relevant projects for the enhancement or deculverting of other sections of rivers or watercourses.
- C. Existing wharves and their access will be protected for continued use.
- D. Proposals that would adversely affect the infrastructure of main rivers and ordinary watercourses, or which fail to secure feasible enhancements or deculverting, will be resisted.
- E. Development located in or adjacent to watercourses should enhance the waterside environment and biodiversity by demonstrating a high design quality which respects the historic significance of the canal and character of the waterway and provides access and improved amenity to the waterfront.
- F. All development alongside or that benefits from a frontage on the Grand Union Canal will be expected to contribute to improvements to biodiversity improvements to the Canal.

148. Policy DMHB 18 of the LLP2 states:

Private Outdoor Amenity Space

- 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 street scene 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.

149. Policy DMHB 19 of the LPP2 states:

Play Space

- A. New major residential developments which result in an occupancy of ten or more children will be required to provide children and young people's play facilities on-site. Where a satisfactory level of provision for children and young people's play facilities cannot be achieved on-site, the Council will seek a financial contribution towards the improvement of existing children and young people's play facilities within the local area.
- B. 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 overriding 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.

FLOOD RISK & DRAINAGE

NPPF

150. Paragraph 100 of the NPPF states:

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- applying the Sequential Test;
- if necessary, applying the Exception Test;
- safeguarding land from development that is required for current and future flood management;
- using opportunities offered by new development to reduce the causes and impacts of flooding; and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

London Plan

151. Policy 5.2 of the London Plan states:

Minimising Carbon Dioxide Emissions

Planning decisions

- A. Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- 1 Be lean: use less energy
- 2 Be clean: supply energy efficiently
- 3 Be green: use renewable energy

- B. The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.

Residential buildings:**Year Improvement on 2010 Building Regulations**

2010 – 2013 25 per cent (Code for Sustainable Homes level 4)t

2013 – 2016 40 per cent

2016 – 2031 Zero Carbon

Non-domestic buildings:**Year Improvement on 2010 Building Regulations**

2010 – 2013 25 per cent

2013 – 2016 40 per cent

2016 – 2019 As per building regulations requirements

2019 - 2031 Zero Carbon

- C. Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.
- D. As a minimum, energy assessments should include the following details:
- a) calculation of the energy demand and carbon dioxide emissions covered by Building Regulations and, separately, the energy demand and carbon dioxide emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (see paragraph 5.22) at each stage of the energy hierarchy
 - b) proposals to reduce carbon dioxide emissions through the energy efficient design of the site, buildings and services
 - c) proposals to further reduce carbon dioxide emissions through the use of decentralised energy where feasible, such as district heating and cooling and combined heat and power (CHP)
 - d) proposals to further reduce carbon dioxide emissions through the use of on-site renewable energy technologies.
- E. The carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.

152. Policy 5.12 of the London Plan states:

Flood Risk Management

Strategic

- A. The Mayor will work with all relevant agencies including the Environment Agency to address current and future flood issues and minimise risks in a sustainable and cost effective way.

Planning decisions

- B. Development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk¹ over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 (TE2100 – see paragraph 5.55) and Catchment Flood Management Plans.
- C. Developments which are required to pass the Exceptions Test set out in the NPPF and the Technical Guidance will need to address flood resilient design and emergency planning by demonstrating that:
 - a) the development will remain safe and operational under flood conditions
 - b) a strategy of either safe evacuation and/or safely remaining in the building is followed under flood conditions
 - c) key services including electricity, water etc will continue to be provided under flood conditions
 - d) buildings are designed for quick recovery following a flood.
- D. Development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible should aim to be set back from the banks of watercourses and those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

LDF preparation

- E. In line with the NPPF and the Technical Guidance, boroughs should, when preparing LDFs, utilise Strategic Flood Risk Assessments to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks, particularly through redevelopment of sites at risk of flooding and identifying specific opportunities for flood risk management measures.

153. Policy 5.13 of the London Plan states:

Sustainable Drainage

Planning decisions

- A. Development should 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 in line with the following drainage hierarchy:
 - 1 store rainwater for later use
 - 2 use infiltration techniques, such as porous surfaces in non-clay areas
 - 3 attenuate rainwater in ponds or open water features for gradual
 - 4 attenuate rainwater by storing in tanks or sealed water features for gradual release
 - 5 discharge rainwater direct to a watercourse
 - 6 discharge rainwater to a surface water sewer/drain
 - 7 discharge rainwater to the combined sewer. Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.

LDF preparation

- B. Within LDFs boroughs should, in line with the Flood and Water Management Act 2010, utilise Surface Water Management Plans to identify areas where there are particular surface water management issues and develop actions and policy approaches aimed at reducing these risks.

Saved UDP

154. Policy OE8 of the saved UDP states:

Planning permission will not be granted for new development or redevelopment of existing urban areas which would result in an increased flood risk due to additional surface water run-off, unless the proposed development includes appropriate attenuation measures to a standard satisfactory to the council, in consultation with the environment agency and, where appropriate, other drainage bodies.

LPP1

155. Policy EM6 of the LLP1 states:

Flood Risk Management

The Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF).

The subsequent Hillingdon Local Plan: Part 2 -Site Specific Allocations LDD will be subjected to the Sequential Test in accordance with the NPPF. Sites will only be allocated within Flood Zones 2 or 3 where there are overriding issues that outweigh flood risk. In these instances, policy criteria will be set requiring future applicants of these sites to demonstrate that flood risk can be suitably mitigated.

The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.

LPP2

156. Policy DMEI 9 of the LPP2 states:

Management of Flood Risk

- A. All development proposals in Flood Risk Zones 2 and 3a (medium and high probability risk) and areas identified as being at risk from artificial sources, sewer and surface water flooding and ordinary watercourses or historic flood events will be required to submit an appropriate level Flood Risk Assessment (FRA)⁹ to demonstrate that the development is resistant and resilient to all relevant sources of flooding.
- B. Development in Flood Zone 3b will be refused in principle unless identified as an appropriate development in Flood Risk Planning Policy Guidance. Development for appropriate uses in Flood Zone 3b will only be approved if accompanied by an appropriate FRA that demonstrates the development will be resistant and resilient to flooding and suitable warning and evacuation methods are in place.
- C. Developments may be required to make contributions (through legal agreements) to previously identified flood improvement works that will benefit the development site
- D. Proposals that fail to make appropriate provision for flood risk mitigation, or which would

AIR QUALITY**NPPF**

157. Paragraph 124 of the NPPF states:

Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

158. Strategic Objective SO11 states:

Address the impacts of climate change, minimise emissions of carbon and local air quality pollutants from new development and transport.

London Plan

159. Paragraph 7.14 states

The physical character of a place can help reinforce a sense of meaning and civility – through the layout of buildings and streets, the natural and man-made landscape, the density of development and the mix of land uses. In some cases, the character is well preserved and clear. In others, it is undefined or compromised by unsympathetic development. Through characterisation studies, existing character can be identified and valued, and used to inform a strategy for improving the place. This should help ensure the place evolves to meet the economic and social needs of the community and enhances its relationship with the natural and built landscape. The community should be involved in setting these goals for the future of the area (Policy 7.1).

LPP1

160. Strategic Objective 11 of the LPP1 states:

Address the impacts of climate change, and minimise emissions of carbon and local air quality pollutants from new development and transport.

161. Policy EM1 states

Climate Change Adaptation and Mitigation

The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.
2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.
3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.
4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.
5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.
6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.

7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation**(39)** as part of their proposals.
8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.
9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate.
The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:
10. Locating and designing development to minimise the probability and impacts of flooding.
11. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.
12. Giving preference to development of previously developed land to avoid the loss of further green areas.
13. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks**(40)**.
14. Promoting the inclusion of passive design **(41)** measures to reduce the impacts of urban heat affects.

LPP2

162. Policy DMEI 14 of the LPP2 states:

Air Quality

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

NOISE

NPPF

163. Paragraph 11 of the NPPF states:

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

164. Paragraph 123 of the NPPF states:

Planning policies and decisions should aim to:

- avoid noise from giving rise to significant adverse impacts²⁷ on health and quality of life as a result of new development;
- mitigate and reduce to a minimum other adverse impacts²⁷ on health and quality of life arising from noise from new development, including through the use of conditions;
- recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established;²⁸ and
- identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

London Plan

165. Policy 7.15 of the London Plan states:

Reducing And Managing Noise, Improving And Enhancing The Acoustic Environment And Promoting Appropriate Soundscapes

Strategic

- A. The transport, spatial and design policies of this plan will be implemented in order to reduce and manage noise to improve health and quality of life and support the objectives of the Mayor's Ambient Noise Strategy.

Planning decisions

- B. Development proposals should seek to manage noise by:
- a) avoiding significant adverse noise impacts on health and quality of life as a result of new development;
 - b) 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 development or adding unduly to the costs and administrative burdens on existing businesses;
 - c) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
 - d) separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation;
 - e) 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 the application of good acoustic design principles;
 - f) having particular regard to the impact of aviation noise on noise sensitive development;
 - g) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

LDF preparation

- C. Boroughs and others with relevant responsibilities should have policies to:
- a) a manage the impact of noise through the spatial distribution of noise making and noise sensitive uses;

- b) b identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.

Saved UDP

166. Policy OE1 of the Saved UDP states:

Planning permission will not normally be granted for uses and associated structures which are, or are likely to become, detrimental to the character or amenities of surrounding properties or the area generally, because of:

- (i) the siting or appearance;
- (ii) the storage or display of vehicles, goods, equipment or other merchandise;
- (iii) traffic generation and congestion;
- (iv) noise and vibration or the emission of dust, smell or other pollutants,

Unless sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable.

167. Policy OE3 of the Saved UDP states:

Buildings or uses which have the potential to cause noise annoyance will only be permitted if the impact is mitigated within acceptable levels by engineering, lay-out or administrative measures.

168. Policy OE5 of the Saved UDP states:

Proposals for the siting of noise sensitive developments such as family housing, schools or certain forms of commercial activity where the occupiers may suffer from noise or vibration will not be permitted in areas which are, or are expected to become, subject to unacceptable levels of noise or vibration. Where development is acceptable in principle, it will still be necessary to establish that the proposed building or use can be sited, designed, insulated or otherwise protected from external noise or vibration sources to appropriate national and local standards. Account will be taken of any changes likely to occur in noise levels within a 10-15 year period following the date of submission of any application for planning permission.

LPP1

169. Policy EM8 of the LPP1 states:

Land, Water, Air and Noise

Water Quality

The Council will seek to safeguard and improve all water quality, both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority along with the:

- River Colne
- Grand Union Canal
- River Pinn
- Yeading Brook
- Porter Land Brook
- River Crane
- Ruislip Lido

Air 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.

All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.

The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air Quality Review and Assessments and Actions plans, in particular where Air Quality Management Areas have been designated.

The Council has a network of Air Quality Monitoring stations but recognises that this can be widened to improve understanding of air quality impacts. The Council may therefore require new major development in an AQMA to fund additional air quality monitoring stations to assist in managing air quality improvements.

Noise

The Council will investigate Hillingdon's target areas identified in the Defra Noise Action Plans, promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected.

The Council will seek to identify and protect Quiet Areas in accordance with Government Policy on sustainable development and other Local Plan policies.

The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

Land Contamination

The Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

Water Resources

The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass litres per person per day.

ARCHAEOLOGY

NPPF

170. Paragraph 128 of the NPPF states:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

London Plan

171. Policy 7.8 states:

Heritage Assets And Archaeology

Strategic

- A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

- C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

LDF preparation

- F. Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.
- G. Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

Saved UDP

172. Policy BE3 of the Saved UDP states:

The local planning authority will ensure whenever practicable that sites of archaeological interest are investigated and recorded either before any new buildings, redevelopment, site works, golf course or gravel extraction are started, or during excavation and

construction. Development which would destroy important archaeological remains will not be permitted.

LPP1

173. Policy HE1 of the LPP1 states:

Heritage

The Council will:

1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes:
 - Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features;
 - Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;
 - Registered Parks and Gardens and historic landscapes, both natural and designed;
 - Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and
 - Archaeologically significant areas, including Archaeological Priority Zones and Areas.
2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.
3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.
4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.

LPP2

174. Policy DMHB 1 states:

Heritage Assets

- A. Development that has an effect on heritage assets will only be supported where:
 - i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;
 - ii) it will not lead to substantial harm or total loss of significance without providing substantial public benefit that outweighs the harm or loss;
 - iii) it makes a positive contribution to the local character and distinctiveness of the area;
 - iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;
 - v) the proposal should relate appropriately in terms of siting, style, scale, massing, height, design and materials;

- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and
 - vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.
- B. Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.
- C. The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.

**APPENDIX 10
ACCOMMODATION SCHEDULE**

RESIDENTIAL SCHEME

Residential Unit Quantum		
Block	Units	%
BLOCK B	490	35
BLOCK C	212	15
BLOCK D	132	10
BLOCK E	179	13
BLOCK F	295	21
BLOCK G	55	4
BLOCK H	18	1
Total	1381	100

Wheelchair Unit M4(3) Quantum		
Block	Units	%
BLOCK B	39	28
BLOCK C	33	24
BLOCK D	9	6
BLOCK E	1	1
BLOCK F	57	41
BLOCK G	0	0
BLOCK H	0	0
Total	139	100

Total Mix - All Blocks		
Unit Type	Number	%
Studio 0B1P	111	8
Flat 1B2P	575	42
Flat 2B3P	527	40
Flat 2B4P	0	
Duplex 2B4P	30	
Flat 3B4P	67	10
Flat 3B5P	30	
Duplex 3B5P	41	
Total	1381	100

Total Habitable Rooms - All Blocks		
Unit Type	Number	%
Studio 0B1P	111	3
Flat 1B2P	1150	33
Flat 2B3P	1581	48
Flat 2B4P	0	
Duplex 2B4P	90	
Flat 3B4P	268	16
Flat 3B5P	120	
Duplex 3B5P	164	
Total	3484	100

Parking Spaces - Day One		
Location	Number	Total
Off Street		241
Standard Bays (Permanent)	74	
Standard Bays (Convertible)	121	
M4(3) (Permanent)	0	
Blue Badge Bays (Permanent)	26	
Non-Resi Bays (Permanent)	20	
Podium		471
Standard Bays (Permanent)	135	
Standard Bays (Permanent)	318	
M4(3) Permanent	18	
Total		712

Parking Spaces - Future Extension		
Location	Number	Total
Off Street		241
Standard Bays (Permanent)	74	
M4(3) (Converted)	76	
M4(3) (Green Converted)	45	
Blue Badge Bays (Permanent)	26	
Non-Resi Bays (Permanent)	20	
Podium		471
Standard Bays (Permanent)	135	
Standard Bays (Permanent)	318	
M4(3) Permanent	18	
Total		712

Cycle Spaces		
Typology	Number	Total
Off Street		78
Visitors	78	
Storage		2108
Belsure and Sheffield	1991	
M4(3)	117	
Total		2186

Density	
Definition	
Barratt Site (ha)	7.18
Segro Site (ha)	5.1
Industrial / Distribution Area (ha)	4.17
Residential and Communal Area (ha)	8.11
Habitable rooms per hectare (hr/ha)	430
Dwellings per hectare (d/ha)	170

Public Open Space	
Designation	Area m2
Public Open Space including play area*	35,612
Expansion Zone for Future M4(3) Parking	910
Green Bays on Street	1,080
Communal Amenity Space	9,025
Total	46,627

The Play Area is included

Building Heights (lower than HIS=+67.93)				
Location	Storeys	Grd (AOD)	Ht (AOD)	Ht (m)
B1	G+7	+31.900	+58.340	26.440
B2	G+7	+31.900	+58.340	26.440
B3	G+8	+31.900	+61.415	29.515
B4	G+5	+31.900	+52.265	20.365
B5	G+9	+31.900	+64.490	32.590
B6	G+8	+31.900	+61.415	29.515
B7	G+10	+31.900	+67.865	35.965
B8	G+6	+31.900	+55.340	23.440
B9	G+10	+31.900	+67.865	35.965
C1	G+5	+31.600	+51.675	20.075
C2	G+7	+31.600	+57.025	25.425
C3	G+4	+31.600	+48.600	17.000
C4	G+7	+31.600	+57.025	25.425
C5	G+5	+31.600	+51.675	20.075
C6	G+3	+31.600	+51.675	20.075
D1	G+9	+31.600	+63.200	31.600
D2	G+7	+31.600	+57.825	26.225
D3	G+2	+31.400	+41.964	10.564
D4	G+4	+31.400	+51.675	20.275
E1	G+10	+32.200	+67.730	35.530
E2	G+8	+32.200	+60.125	27.925
E3	G+4	+32.200	+52.275	20.075
F1	G+4	+31.300	+51.210	19.910
F2	G+5	+31.300	+54.755	23.455
F3	G+10	+31.300	+66.775	35.475
F4	G+4	+31.300	+47.775	16.475
G	G+4	+31.300	+47.860	16.560
H	G+5	+31.350	+52.955	21.605
I	G+1	+30.350	+43.330	12.980

Proposed Floorspace Residential Units				
Location	Use Class	NSA m2	GIA m2	GEA m2
B	C3	30,097	38,509	41,531
C	C3	13,505	17,411	19,380
D	C3	7,999	10,348	11,322
E	C3	10,890	13,738	14,862
F	C3	17,952	22,630	25,388
G	C3	3,662	5,616	6,145
H	C3	1,278	1,760	2,005
Total		85,382	110,012	120,632

Proposed Floorspace Non-residential				
Location	Use Class	NSA m2	GIA m2	GEA m2
F	B1 / B8 / D2	164	174	220
H	A1 / A3 / A4	158	155	174
I	A3 / A4 / B1 / D1	2,094	2,415	2,592
Total		2,416	2,743	2,986

Proposed Floorspace Basement and Undercroft				
Designation	Location	NSA m2	GIA m2	GEA m2
Basement	Block B		4,192	4,318
Podium	Block B+C		11,099	11,284
Undercroft	Block D+E		636	700
Total		0	15,927	16,302

Proposed Floorspace Residential Area				
Designation	Location	NSA m2	GIA m2	GEA m2
Blocks	B, C, D, E, F, G, H, I	87,798	128,682	139,921

INDSUTRIAL / DISTRIBUTION SCHEME

GEA Floorspace - Industrial / Distribution			
Location	Unit m2	Office m2	Plant m2
Unit 1	7,096	699	25
Unit 2	2,011	300	25
Unit 3	2,857	392	25
Unit 4	7,748	1,460	25
Total	19,712	2,851	100
		22,663	

Cycle Spaces Provided	
Location	Spaces
Unit 1	24
Unit 2	8
Unit 3	12
Unit 4	28
Total	72

Car Parking Spaces				
Location	Std+Visitors	M4(3)	Active	Passive Elec
Unit 1	44	7	15	7
Unit 2	13	2	4	2
Unit 3	19	3	6	3
Unit 4	53	8	18	9
Total	129	20	43	21
			213	

