



**PEACOCK +
SMITH**

Hillingdon Council
Haydon Drive, Pinner, HA5 2PW

Planning Statement

March 2025

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1. Introduction

1.1. This Planning Statement has been prepared by Peacock + Smith, on behalf of Hillingdon Council, to support an application for a new affordable housing scheme comprising 21 family-sized houses at Haydon Drive, Eastcote, Piner, HA5 2PW.

1.2. The planning application seeks full permission for:

"Demolition of existing buildings and proposed redevelopment for: 21, 3 and 4-bedroom residential units, enhanced pedestrian access points, exterior amenity spaces, car and cycle parking, refuse storage, servicing areas, and both hard and soft landscaping."

1.3. This statement assesses the Proposed Development in relation to the statutory development plan and other relevant policy considerations. It demonstrates that the proposal accords with the current local and national policy approach for new housing.

1.4. In addition to this Planning Statement, the following documents have been prepared to support the Proposed Development:

- Design and Access Statement, prepared by Hunters;
- Existing and Proposed Plans, prepared by Hunters, including:
 - Site Location Plan (dwg no. M10029_APL001_A)
 - Topographical Survey (dwg no. M10029_APL002_A)
 - Existing Plans & Elevations (dwg no. M10029_APL003_A)
 - Existing Plans & Elevations (dwg no. M10029_APL004_A)
 - Existing Plans & Elevations (dwg no. M10029_APL005_A)
 - Proposed Site Plan (dwg no. M10029_APL006)
 - Proposed Landscape Plan (dwg no. M10029_APL007)
 - Proposed Ground Floor Plan (dwg no. M10029_APL101)
 - Proposed First Floor Plan (dwg no. M10029_APL102)
 - Proposed Second Floor Plan (dwg no. M10029_APL103)
 - Proposed Roof Plan (dwg no. M10029_APL104)
 - Proposed Street Elevations (dwg no. M10029_APL201)

- Proposed Street Elevations (dwg no. M10029_APL202)
- Proposed Rear Elevations (dwg no. M10029_APL203)
- Proposed Rear Elevations 2 (dwg no. M10029_APL204)
- Proposed Site Sections (dwg no. M10029_APL210)
- Proposed Site Sections 2 (dwg no. M10029_APL211)
- Block A1 Plans & Elevations (dwg no. M10029_APL301)
- Block A2 Plans & Elevations (dwg no. M10029_APL302)
- Block B Plans & Elevations (dwg no. M10029_APL303)
- Block C Plans & Elevations (dwg no. M10029_APL304)
- Block D Plans & Elevations (dwg no. M10029_APL305)
- View from Joel Street (dwg no. M10029_APL401)
- View from Haydon Drive (dwg no. M10029_APL402)
- View from Haydon Drive (North-West) (dwg no. M10029_APL403)
- Arboricultural Impact Assessment Method Statement & Tree Protection Plan (with Tree Constraints Plan and Tree Data Schedule), prepared by Trevor Heaps Arboricultural Consultancy Ltd;
- Daylight and Sunlight Amenity (within) Report and Daylight and Sunlight Amenity (Neighbouring) Report, prepared by Rapleys;
- Drainage Statement, prepared by SD Engineers;
- Preliminary Ecological Appraisal (and phase 1 habitat map), prepared by Middlemarch;
- Biodiversity Statement and Metric Assessment, prepared by Middlemarch;
- Topographical Levels Survey Drawings, prepared by MK BIM Solutions, including:
 - MBS21558-Survey Drawings
 - MBS21558-E-R1
 - MBS21558-T-R1
- Preliminary Investigation Soil and Ground Report and Main Investigation Soil and Ground Report, prepared by Soils Limited;

- Travel Statement and Travel Plan, prepared by Motion;
- Utilities Survey, prepared by Cornerstone Projects LTD;
- Fire Statement Form, prepared by Robson Frankham;
- Overheating Assessment, prepared by Eight Versa;
- Energy Assessment, prepared by Eight Versa;
- Sustainability Statement, prepared by Eight Versa;
- Air Quality Assessment, prepared by Eight Versa.

Background

- 1.5. The Application Site, (herein referred to as the 'Site'), is situated in the northwest corner of a predominantly flatted estate in the suburban location of Pinner, Hillingdon.
- 1.6. The Application Proposal seeks to redevelop the previously developed land at Haydon Drive, to provide twenty-one affordable family homes, comprising of four-unit types consisting of three-bed and four-bed properties, with associated carparking, cycle storage, refuse facilities, private amenity space, landscaping and a dedicated children's play area.
- 1.7. As outlined with the Design and Access Statement (DAS) prepared by Hunters, the Site currently situates sixteen outdated studio bungalows, nine of which are currently let on secure tenancies, three on fixed-term tenancies, and four on a short-life basis. The dwellings no longer adhere to national and local space and living standards and, due to their limited size and layout, are unsuitable for people with mobility issues. The existing dwellings are also difficult to let, with above-average void periods between lettings. As such, the application proposal offers an opportunity to deliver modern, well-designed family homes that better address the housing needs of the local community.

Pre-app and Consultation Report

- 1.8. Pre-application advice has been sought in recent years in respect of the Site proposals from Officers at the London borough of Hillingdon. A comprehensive account of these discussions, including the project timeline and how stakeholder feedback shaped the design evolution, is documented in the Design and Access Statement (DAS).

- 1.9. As a result of the pre-application discussions, the initial consultation on high-density apartment blocks was superseded by a proposal for family homes. The Proposed Development has successfully addressed prior Officer concerns regarding its integration with the surrounding suburban area, development density, and architectural design. This has led to the agreement of the scheme in principle by the Officers, with the massing, appearance and materiality aspects of the scheme being further developed during the October 2024 pre-application meeting.
- 1.10. The applicant consulted with the existing residents of the studio bungalows on site for a better understanding of their needs and recommendations, ensuring local people are involved in shaping the planning and decision-making process. The applicant also arranged a public consultation on the 19th of March 2025 at Northwood Hills Library between 3pm and 7pm where the public were given the opportunity to express their views on the proposals and make further recommendations. The feedback received and relevant responses by the Council and Hunters are summarised in the DAS.

Structure of the Report

- 1.11. As demonstrated throughout this Statement and the accompanying documents, the Proposed Development is considered to align with the objectives of the National Planning Policy Framework (2024), the London Plan (2021) and the London Borough of Hillingdon's Local Plan Part 1 and 2.
- 1.12. The remainder of this Report is structured as follows:
 - (a) **Section 2:** describes the site and discusses the planning history;
 - (b) **Section 3:** describes the Proposed Development;
 - (c) **Section 4:** considers key planning considerations;
 - (d) **Section 5:** analyses the planning considerations relevant to the proposal;
 - (e) **Section 6:** summarises and concludes.

2. Site Description and Planning History

Site Description

- 2.1. The Proposed Development at Haydon Drive (herein referred to as the 'Site') is approximately 0.58 hectares, and located in a suburban area characterised by low-rise, two-storey street patterns.
- 2.2. The predominant facing materials in the designated area are red brick and London stock brick. Other notable features of the surrounding properties include the use of roughcast render, gable roofs, and hipped roofs. The architectural language is relatively diverse, with many dwellings featuring distinct cladding or façade treatments for the ground and first floors.
- 2.3. The Site is bound to the north by Chamberlain Lane, to the west by Joel Street and to the east and south by Haydon Drive. The surrounding streets are predominately residential in character.
- 2.4. The Site is accessed from the southeast corner from Haydon Drive. Pedestrian access is also provided from Joel Street and Chamberlain Lane by a public footpath which dissects the north of the site.
- 2.5. The Site holds a PTAL no. 1B, which is expected given the sites suburban location. The nearest station to the site is the Northwood Hills Underground Station, located approximately 0.9 miles north of the site, and operates on the Metropolitan line, providing direct access to the major interchange railway stations at Kings Cross and Liverpool Street. Furthermore, Eastcote Station is 1.7 miles southeast of the Site, served by the Metropolitan Line and the Piccadilly line which provide direct access to London Paddington.
- 2.6. The Site is a two-minute (0.1miles) walk away from Haydon Drive Bus Stop, which operates bus number 282. The area also now features a new Crossrail service which links Heathrow and the Hayes/West Drayton Corridor through Eastcote, this makes it accessible to travel from the north to the south of the borough.
- 2.7. The Site offers an ideal location for new family housing, being situated within Eastcote, a designated District Centre within the London Borough of Hillingdon Spatial Framework. District Centres provide a valuable range of 'walk to' shops and services for their local communities. Eastcote is also home to several historic sites, including Eastcote House Gardens, Haydon Hall, and Highgrove House.

- 2.8. The immediate surrounding area of the Site is predominantly a peaceful residential area, surrounded by green spaces, including parks, woods, playing fields, and cricket pitches. Notably, Haydon Meadows is located within a 12-minute walking distance of the site. Additionally, a large Tesco is approximately a 7-minute drive from the site.
- 2.9. The Site is not in a conservation area, nor in close proximity to any listed buildings. However, an Area of Special Local Character (Raisins Hill) and Haydon Hall Meadows (both Green Belt land and a Site of Importance for Nature Conservation (SINC) (Grade I)) are located to the east of the site. The conservation area South Eastcote Village is also in relative proximity to the Site.
- 2.10. The Site is not located within a Tree Preservation Order (TPO) Area, however the TPO Area reference W1 (Land at Joel Street Farm and South Hill Farm) and TPO 387 are located to the west of the Site.
- 2.11. The Site is located within Flood Zone 1; however, small patches of the Site are at risk of a medium chance of surface water flooding. A Drainage Statement prepared by SD Engineers details the proposed strategy for surface water discharge.

Planning History

- 2.12. There are no historic applications of relevance to the submitted application.

3. The Proposed Development

- 3.1. The Development Proposal seeks to demolish the existing 16 studio bungalows and redevelop the Site to provide 21, 2-2.5 storey dwellings. This Proposal will both redevelop and enhance a declining Site within the prime location of Eastcote and meet the strong demand within the area for affordable family-sized homes.
- 3.2. As outlined within the additional plans prepared by Hunters and submitted alongside this planning statement, the Development Proposal consists of 4 distinct dwelling types, each unique in design. As such, the proposal comprises of 11, 2.5 storey 4B8P (situated in block A1 and A2), 3, 2-storey 3B6P (situated in block B), 3 2-storey 3B5P homes (M4(3) wheelchair user dwellings) (situated in block C), and 4 2.5-storey 4B7P homes (situated in block D), resulting in a proposed density of 36u/ha.
- 3.3. To accommodate the future residents of the proposal, the development will provide 31 parking spaces, alongside a twin cycle store and refuse area for each dwelling. Each dwelling will also benefit from both front and rear gardens and a terrace. Moreover, the Site itself comprises approx. 740sqm of public open space towards the north boundary, which has been retained and enhanced to provide an overlooked children's play space area for both the residents and the local community.
- 3.4. Vehicular access to the Site will remain via Haydon Drive, leading onto Joel Street. Meanwhile, the Proposed Development will retain the existing right of way to the north of the Site which links the Site to Chamberlain Lane. The Proposed Development has also incorporated the two existing pedestrian access points from Joel Street along the western boundary into the scheme. These access arrangements will separate the vehicle and pedestrian access, whilst also improving the pedestrian permeability to the Site from the wider area.
- 3.5. The DAS outlines that for the proposed material palette, rustic red clay tiles are proposed for the roof, while the building's façade will feature buff multi-brick, complemented by brown/beige facing brick alongside feature brick, and bronze-coloured windows. The DAS provides a detailed description of the developments design evolution. We discuss the design of the Proposed Development further in Section 5 of this Statement.
- 3.6. Other features of the Proposed Development, as detailed within the DAS, include:

- Passive Solar Design: Introduced via the proposed optimisation of solar shading where possible within the Proposed Development.
- Green Infrastructure: Facilitated via the proposed planting of new trees, integration of green infrastructure (including green roofs) and sustainable drainage systems (SuDS).
- Renewables: Implemented via proposed new roof-mounted solar energy PV panels and air source heat pumps.
- Active Frontage: Provided along all public routes using the proposed perimeter block layout with private rear gardens.
- Servicing Strategy: Addressed via the proposed turning head at the end of the internal street enabling refuse collection and emergency vehicles to service the development via the access on Haydon Drive.
- Separation Distance and Amenity: Accommodated through the proposed private outdoor patio area inset on Blocks B and C, from the building line, enabling privacy and shade. Meanwhile, corner units have been designed to optimise their aspect, amenity and footprint.

4. Planning Policy

4.1. Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the statutory Development Plan unless material considerations indicate otherwise.

4.2. The development plan comprises:

- Local Plan: Part 1 Strategic Policies (Adopted November 2012)
- Local Plan Part 2 Development Management Policies (Adopted January 2020)

Local Plan: Part 1 - Strategic Policies

4.3. The London Borough of Hillingdon Plan Part 1 – Strategic Policies was adopted in November 2012. This sets out the main policies and overarching objectives which inform future development for the authoritative area.

4.4. **Policy H1 (Housing Growth)** focuses on meeting the London Plan target of delivering 425 new homes annually to address housing shortages and states support for “new homes that reflect the distinct land use characteristics of the borough’s north and south, high-quality mixed-use developments, and sufficient community infrastructure to support new housing”. The policy also resists the loss of housing and encourages the conversion of suitable properties to maximise housing potential.

4.5. **Policy H2 (Affordable Housing)** emphasises maximising affordable housing delivery across all sites, with a focus on the housing-mix meeting the needs of the borough for those with a capacity of 10 or more units. The policy prioritises addressing the boroughs demand for larger affordable family units. The plan is to allocate 35% of all new housing units in the Borough as affordable housing. Of this, 70% will be social rented and 30% intermediate housing. In terms of unit size, 70% of the housing demand is for two and three-bedroom units, over 20% is for four-bedroom units, and nearly 7% is for one-bedroom units.

4.6. **Policy BE1 (Built Environment)** ensures all new development enhances the built environment to create sustainable, high-quality neighbourhoods that meet the needs of residents.

- 4.7. **Policy EM1 (Climate Change Adaptation and Mitigation)** requires housing projects to minimise flood risk through careful site selection and water cycle management, including drainage and water consumption. Priority is given to redeveloping previously developed land to preserve green spaces, aligning with broader sustainability goals.
- 4.8. **Policy EM6 (Flood Risk Management)** mandates the use of sustainable urban drainage systems (SUDS) for all developments unless proven unviable and encourages linking SUDS to water efficiency methods.
- 4.9. **Policy EM4 (Open Space and Informal Recreation)** outlines that open space, and informal recreational areas will be in walking distance to homes.
- 4.10. **Policy EM7 (Biodiversity and Geological Conservation)** outlines that developers are required to contribute to nearby conservation efforts, support actions in the Biodiversity Action Plan, and incorporate biodiversity improvements, such as green roofs, living walls, and sustainable drainage systems, to promote ecological connectivity and address climate change.
- 4.11. **Policy EM8 (Land, Water, Air and Noise)** outlines measures to safeguard and improve water quality, including efficient use of water resources.
- 4.12. **Policy EM11 (Sustainable Waste Management)** developments should align with the waste hierarchy. This includes reducing waste generation through best practices, reusing materials, and integrating recycling. Energy recovery and composting should be supported where feasible.

Local Plan Part 2: Development Management Policies

- 4.13. **Local Plan: London Borough Of Hillingdon Local Plan Part 2 Development Management Policies (Adopted January 2020)** outlines more detailed policies that form the basis of the Council's decisions on individual planning applications.
- 4.14. **Policy DMH 6 (Garden and Backland Development)** outlines that there is a presumption against the loss of gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases, a limited scale of backland development may be acceptable, subject to the following criteria:
 - i) *neighbouring residential amenity and privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;*

- ii) vehicular access or car parking should not have an adverse impact on neighbours in terms of noise or light;*
- iii) access roads between dwellings and unnecessarily long access roads will not normally be acceptable;*
- iv) development on backland sites must be more intimate in mass and scale and lower than frontage properties; features such as trees, shrubs and wildlife habitat must be retained or re-provided.*

4.15. **Policy DMH 7 (Provision of Affordable Housing)** states that 'affordable housing should be built to the same standards and should share the same level of amenity as private housing'.

4.16. **Policy DMHB 11 (Design of New Development)** requires all developments to meet high design standards, harmonising with the local context by considering scale, plot sizes, street patterns, architectural detailing, and views. Developments must use quality materials, ensure sustainable and adaptable layouts, protect heritage assets and features of value, and incorporate landscaping to enhance biodiversity and green infrastructure. Proposals must not harm the amenity, daylight, or sunlight of neighbouring properties and must safeguard redevelopment potential of adjoining sites. Adequate, well-designed waste storage and screened external bins must also be provided to minimise nuisance and visual impact.

4.17. **Policy DMHB 12 (Streets and Public Realm)** emphasises that developments should integrate seamlessly with their surroundings and enhance accessibility. They must improve wayfinding, respect the local townscape character, and include purposeful landscaping that contributes to green infrastructure and ease of movement. Developments must follow inclusive design principles, and gated communities will not be supported.

4.18. **Policy DMHB 14 (Trees and Landscaping)** outlines all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

4.19. **Policy DMHB 15 (Planning for Safer Places)** outlines that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles and includes several measures that should be included in the design and access statement.

4.20. **Policy DMHB 16 (Housing Standards)** requires that all housing developments provide adequate internal space for a suitable living environment.

- 4.21. **Policy DMHB17 (Residential Density)** all new development is expected to consider the residential density matrix and meet habitable rooms standards.
- 4.22. **Policy DMHB 18 (Private Outdoor Amenity Space)** outlines that new residential developments are required to meet higher amenity space standards, exceeding the London Housing SPG.
- 4.23. **Policy DMHB 19 (Play Space)** outlines that 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.
- 4.24. **Policy DMEI 1 (Living Walls and Roofs and on-site Vegetation)** Major developments must include living roofs or walls, with justification required if not feasible.
- 4.25. **Policy DMEI 2 (Reducing Carbon Emissions)** All major development proposals must be accompanied by an energy assessment presenting how carbon dioxide reductions will be achieved in line with London Plan targets.
- 4.26. **Policy DMEI 3 (Decentralised Energy)** All major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN).
- 4.27. **Policy DMEI 7 (Biodiversity Protection and Enhancement)** requires new developments to retain and enhance existing biodiversity or geological features.
- 4.28. **Policy DMEI 10 (Water management, Efficiency and Quality)** requires new developments to show there is sufficient capacity in the water and wastewater infrastructure network to provide for the needs of the new development through addressing the measures outlined for all new developments.
- 4.29. **Policy DMEI 14 (Air Quality)** requires development proposals to reduce emissions, ensuring compliance with EU and national air quality standards. Proposals must be at least "air quality neutral," mitigate risks to sensitive receptors, and contribute to air quality improvements
- 4.30. **Policy DMCI 4 (Open Spaces in New Development)** outlines that proposals for major residential developments in Hillingdon must provide or enhance open spaces to meet local needs and address deficiencies, aligning with local standards. New spaces should integrate with existing green networks or provide civic spaces in town centres. Proposals lacking suitable open space provision will be resisted.

4.31. **Policy DMCI 5 (Children's Play Areas)** aligning with London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds and development within areas of deficiency should account this requirement of children's play space.

4.32. **Policy DMCI 7 (Planning Obligations and Community Infrastructure Levy)** planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it, and planning obligations will be sought on a scheme by scheme basis, regarding affordable housing, infrastructure needs not already addressed by the CIL and any mitigation measures needed due to the introduction of the proposal.

4.33. **Policy DMT 1 (Managing Transport Impacts)** New residential developments must meet transport needs sustainably by ensuring accessibility via public transport, walking, and cycling for residents, employees, and visitors. Proposals must maximize safe, inclusive access for all, including disabled individuals, and address delivery and servicing requirements. Developments should avoid significant adverse impacts on transport, air quality, noise, and local environments, particularly on the strategic road network.

4.34. **Policy DMT 2 (Highways Impacts)** New residential developments must provide safe and efficient vehicular access meeting Council standards, ensure safety and convenience for cyclists and pedestrians, and avoid deterioration of air quality, noise, or local amenities. Traffic impacts, including congestion, must be minimised through appropriate routing to the strategic road network. Where impacts on road capacity and functionality occur, suitable mitigation measures must be implemented.

4.35. **Policy DMT 4 (Public Transport)** the council will require developers to mitigate transport impacts from development proposals by improving local public transport facilities and services.

4.36. **Policy DMT 5 (Pedestrians and Cyclists)** outlines that safe, direct and inclusive access for pedestrians and cyclists should be provided on the site.

4.37. **Policy DMT 6 (Vehicle Parking)** outlines that vehicle parking is to in line with the specific outlined parking standards.

The London Plan (2021)

4.38. The London Plan was adopted in March 2021 and is a material consideration for this application and is part of the Statutory Development Plan. The following policies are relevant in relation to this application:

- 4.39. **Policy GG2 (Making the best use of land)** addresses the need for those involved in the planning process to prioritise sites which are well-connected by public transport and proactively explore the potential to intensify the use of land to support additional homes, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure, and amenities.
- 4.40. **Policy GG4 (Delivering the homes Londoners need)** sets out that those involved in planning and development must ensure more homes are delivered, meet high standards for design and provide for Identified needs, identify and allocate a range of sites to deliver housing locally and establish ambitions and achievable build-out rates at the planning stage.
- 4.41. **Policy D3 (Optimising site capacity through the design-led approach)** outlines the specific criteria for new development to follow to make the best use of land in line with a design-led approach.
- 4.42. **Policy D4 (Delivering good design)** notes that Design and Access Statements should demonstrate that the proposal meets the requirements of the London Plan.
- 4.43. **Policy D5 (Inclusive design)** encourages the highest standard of accessible and inclusive design possible for development.
- 4.44. **Policy D6 (Housing quality and standards)** outlines that housing development should be of high-quality design and provide adequately sized rooms (in line with the London Plan's Table 3.1) with comfortable and functional layouts which meet the needs of Londoners. The policy goes on to set out that the design of development should provide sufficient daylight and sunlight to new and surrounding housing, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. The policy notes the importance of accessible storage space.
- 4.45. **Policy D12 (Fire safety)** sets out that development proposals must achieve the highest standards of fire safety.
- 4.46. **Policy D14 (Noise)** addresses the methods for reducing, managing, and mitigating noise to improve health and quality of life for new developments.
- 4.47. **Policy H1 (Increasing housing supply)** discusses the importance of meeting the ten-year housing completion targets.

- 4.48. **Policy HC1 (Heritage Conservation and Growth)** outlines the importance of demonstrating a clear understanding of the historic environment and identifying the relevant heritage assets that may be affected by a Proposed Development.
- 4.49. **Policy G4 (Open space)** sets out that development proposals should, where possible, create areas of publicly accessible open space.
- 4.50. **Policy G5 (Urban Greening)** states that all major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design.
- 4.51. **Policy SI1 (Improving air quality)** sets out the ways in which development should ensure that it does not lead to further deterioration of air quality or create unacceptable risk of high levels of exposure to poor air quality.
- 4.52. **Policy SI2 (Minimising Greenhouse Gas Emissions)** states that major development should be net zero-carbon meaning the greenhouse gases that are emitted whilst the site is in operation are minimised. This policy also requires major development to be supported by a detailed energy strategy demonstrating how the zero-carbon target will be met. The minimum on-site reduction is at least 35% beyond the Building Regulations for major development.
- 4.53. **Policy SI3 (Energy Infrastructure)** discusses the approaches required to ensure the Proposed Development compliant with specific regulations and fit for purpose for future occupiers.
- 4.54. **Policy SI4 (Managing Heat Risk)** addresses the importance that design, layout, orientation, materials and the incorporation of green infrastructure for all new development proposals can have in reducing the potential for internal overheating thus lowering the reliance on air conditioning systems.
- 4.55. **Policy SI12 (Flood Risk Management)** states that "*current and expected flood risk from all sources across London should be managed in a sustainable and cost-effective way in collaboration with the Environmental Agency*". Development proposals should ensure that flood risk is minimised and mitigated.
- 4.56. **Policy SI13 (Sustainable drainage)** sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. It sets out a preference for green over grey features, in line with its drainage hierarchy.

4.57. **Policy T1 (Strategic Approach to Transport)** is set out to encourage all new development to make the most effective use of land. This involves focusing on its connectivity and accessibility through the existing and future public transport options, walking and cycling routes. Potential impacts on London's transport networks need to be mitigated throughout this process.

4.58. **Policy T5 (Cycling)** sets out that appropriate levels of cycle parking should be provided, which should be fit for purpose, secure and well-located. Policy T5 sets out that developments should provide cycle parking at least in accordance with the minimum standards set out in the London Plan's Table 10.2.

National Planning Policy Framework (NPPF) (2024)

4.59. The NPPF was issued in 2024 and contains national planning policy on a variety of subjects and how these are expected to be applied.

4.60. **Paragraph 2** requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise (Section 38 (6) of the Planning Compulsory and Purchase Act 2004).

4.61. **Paragraph 8** refers to the three objectives necessary to achieve sustainable development: an economic objective, a social objective and environmental objective.

4.62. **Paragraph 11** sets out the presumption in favour of sustainable development. It encourages Local Planning Authorities to positively seek opportunities to meet development needs (paragraph 11a), and to approve development proposals that accord with the development plan without delay (Paragraph 11c).

4.63. **Chapter 5** relates to the delivery of supply of homes and within it, national policies for meeting the Government's objective to significantly boost the supply of homes in England are outlined. Paragraph 61 states "*To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.*"

4.64. **Chapter 11** of the NPPF which is entitled 'Making effective use of land' is of particular relevance to this proposal. The relevant suggestions in **Paragraph 125** are as follows:

- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)

4.65. **Chapter 12** of the NPPF addresses achieving well-designed places. **Paragraph 131** states that “*good design is a key aspect of sustainable development*” as it creates better places to live and work and ensure communities view the development in a positive light. This is reflected in the level of expectations set for the proposal and through effective engagement with relevant stakeholders throughout the process.

4.66. **Paragraph 135** highlights the function of planning policies decisions ensuring developments are fit for purpose while enhancing the overall quality of the area, creating safe and accessible places for all users and optimising the potential of the site.

4.67. **Paragraph 139** refers to the importance of development that is well designed. It states that weight should be awarded to development that reflects compliance with local design policies, government guidance and supplementary planning documents. Recognition should also be given to innovative designs which promote high levels of sustainability where the standard of design is significantly increased in the surrounding area.

4.68. **Chapter 14** tackles the issues associated with climate change and the adaption and mitigation approaches that can be taken to ensure new development is a positively contributing source of sustainability.

4.69. **Chapter 16** entitled ‘conserving and enhancing the natural environment’, outlines the role of planning policies and the effect decision making can have on the natural and local environment.

4.70. Other material considerations include the Sustainable Design and Construction (SPG) which provides guidance on meeting the policies of the London Plan, including energy efficiency, carbon reduction, and resilience to flooding. Alongside, the Accessible Hillingdon SPD (2017) and Planning Obligations document (2014)

5. Planning Considerations

5.1. This section provides an assessment of the main considerations against the key policies set out in Section 4 of this Statement. The main considerations are as follows:

- Principle of Development & Housing Mix
- Design Considerations
- Amenity Impacts
- Transport
- Flood Risk and Drainage
- Energy
- Sustainability
- Trees
- Ecology & Biodiversity Net Gain
- Air Quality
- Ground Conditions and Contamination

Principle of Development & Housing Mix

5.2. The principle of residential use on this Site is established through its existing use and confirmation from Officers at London Borough of Hillingdon via the pre-application process, which determined that a family-unit housing scheme is suitable for this location. This process has informed the development's design, incorporating feedback from the Council, Design Review Panel, and public consultation.

5.3. The provision of new housing on previously developed land and the redevelopment of suitable properties to maximise housing potential is supported by the NPPF paragraph **125**, the London Plan policy **GG2** (Making the Best Use of Land) and Local Plan policy **EM1** (Climate Change Adaptation and Mitigation). The Site is situated in a predominantly residential area; therefore, the principle of redeveloping the outdated bungalows with similar residential uses is considered acceptable in land use terms and positively contributes to Hillingdon's Housing supply in line with policy **H1** (Housing Growth)

5.4. The London Borough of Hillingdon London document: 5 Year Supply of Deliverable Housing Sites 2022/2023 - 2026/2027, supported by Policy **H1**, sets out the ten-year housing target for an

annual average of 1,123 new dwellings per year and outlines the need for new affordable homes. Although Hillingdon Council can demonstrate a 6.5-year housing supply, it is also estimated that the Borough's local housing need will increase by 795 units annually, post the introduction of the new standard method in December (2024), as such, the Proposed Development will work to address the increase in required annual units.

- 5.5. The Local Plan also outlines strong demand for affordable family-sized homes. Policy **H2** states that 70% of the net need is for two- and three-bedroom homes, while over 20% is for four-bedroom properties. As outlined within the SHMA (2021) four-bedroom homes are the hardest to source, creating the biggest supply-demand gap. To address this, the Council's strategy prioritises increasing the supply of larger three and four-bedroom homes. As such, the Proposed Development seeks to address Hillingdon's housing need by supplying 71.4% affordable 4-bed units and 28.6% affordable 3-bed units. The Proposed Development; therefore, positively contributes to Hillingdon's housing need in line with the local plan policies **H1** (Housing Growth), **H2** (Affordable Housing), **DMH 2** (Housing Mix) and **DMH 7** (Provision of Affordable Housing), by providing 21 affordable housing units.
- 5.6. The proposal also outlines improvements for future occupants and existing residents in the surrounding area, addressing the shortfalls of the existing bungalows in terms of space standards and both residential and neighbouring amenity, as specified within the DAS. This will be achieved through the redevelopment of the buildings to deliver a higher standard of design, new active frontage along all public routes and the provision of an upgraded communal space, aligning with local plan Policy **BE1** (Built Environment) and Policy **DMHB 11** (Design of New Development).
- 5.7. The Proposed Development is designated within a District Centre, which has good access to shops, schools, and outdoor facilities, as detailed within section 2 of this document. Although the PTAL rating of the development is relatively low at 1B, this is not unusual for a suburban location. The Proposed Development is therefore considered to be a highly sustainable location for the nature of the development.
- 5.8. In light of the above, the principle of development is considered to be acceptable. The application proposal is considered to fully comply with the relevant policies through the provision of much-needed housing in this sustainable location whilst maximising this previously developed Site to serve the housing needs of the local community.

Design Considerations

Design Quality, Density and Scale

- 5.9. To inform detailed design matters, a DAS has been prepared by Hunters in support of the development proposal. As outlined above, extensive pre-applications discussions were undertaken with the Council and the proposal was subject to Design Review Panel, both of which have informed the final design.
- 5.10. The DAS outlines that the Proposed Development will have a density of 36u/ha units per hectare, and in terms of habitable rooms, the development will have a density of 170hr/ha which far exceeds '*the capacity of the existing studio bungalows (defined by the GLA as 'obsolete homes') on Site*' and aligns with Hillingdon Local Plan standards. As such, the development accords with local policy **DMHB 17** (Residential Density) and London Plan Policy **GG2** (Making the Best Use of Land).
- 5.11. Additionally, the design of the 2-2.5-storey houses effectively addresses the concerns raised by Officers during Pre-Application discussions, regarding the scale, height, density, and mass of the development. Furthermore, to align with local policy, the design has considered plot design, building lines and setbacks, and the appropriate streetscape pattern, as detailed in the DAS and associated plans.
- 5.12. The new proposed design of the housing-led scheme is contemporary in nature; however, it takes design cues from the surrounding area using familiar materials such as red clay tiles and brown brick. Moreover, details such as a cascading roofscape complement the differing designs of each of the dwelling and addresses the natural slope of the Site by approximately 6 meters west to east. In addition, details such as step-downs using parapets and crown-roofs for the fourth dwelling type has provided level access to each property across the sloping site. As such, the design of the proposal respects its surroundings and constraints, enhances the current state of the Site, and complements the mix of architectural styles within the area. In this regard, it is considered to align with Policy **DMHB 11** (Design of Development)

Amenity Impacts

Housing Standards and Amenity

- 5.13. The Proposed Development is considered to align with the minimum floor standards set by the London Plan and local policy **DMHB 16** (Housing Standards), as detailed by the DAS. Policy **DMHB 16** (Housing Standards) also outlines a requirement for all 3+ bedroom dwellings to feature two distinct living areas. While the proposed 3-bedroom units do not fully achieve this requirement, it is considered that the design of the kitchen and living room layout provides adequate mitigation. The angled plan layout will provide space and address resident privacy. Additionally, the provision of separate external amenity areas for residents further addresses the identified shortfall. Moreover, the 4-bedroom units will meet standards by incorporating separate kitchen and lounge/dining spaces.
- 5.14. The redevelopment of the existing bungalows also provides several design enhancements to future-proof the homes for residents, in line with local policy and standards. The dwellings are planned to promote inclusivity through "Lifetime Homes" principles and accessibility, with 14.3% of the dwellings wheelchair user dwellings, aligning with policy **BE1** (Built Environment) and the Council's supplementary accessibility guidance. Moreover, sustainable design principles such as, passive solar design, green infrastructure, soft landscaping and renewables are integrated to create address the Council's sustainable design goals, aligning with local policy **DME1** (Living walls and onsite vegetation) and policy **DME1 2** (Reducing Carbon Emissions). Each dwelling will also provide an integrated bin store and twin cycle store accessible from the street.
- 5.15. All homes are designed with high-quality private external amenity spaces that offer access to natural sunlight and are carefully arranged to ensure privacy. These spaces include private gardens, patios, and terraces and an enhanced, onsite public open space. The DAS section 5.4 'Area Schedule' outlines that while several of the dwellings within the development fall short of the proposed external amenity standards for Hillingdon, outlined by Policy **DMHB 18**, it exceeds London's design standards. Furthermore, the development is well-served by a range of local parks and an additional on-site children's play area (discussed in detail in the Neighbouring Amenity section), which we believe adequately compensates for the minor shortfall, making the development well-suited to its purpose. We note that during previous Pre-App discussions, Officers expressed concern about this shortfall in external amenity; however, they came to a similar conclusion that the development likely provides adequate mitigation.

Daylight and Sunlight within the Proposed Development

- 5.16. The accompanying Daylight and Sunlight Report by Rapley's has assessed the proposed habitable rooms in the new development. We note that the NPPF paragraph **130c** states that '*when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a Site*'.
- 5.17. The Spatial Daylight Autonomy (SDA) results for the type B, C & D properties confirm 100% compliance in every instance, meanwhile, the type A properties are 85% compliant. This is largely due to site constraints resulting in some stand-alone kitchens being placed on the side of the building that receives less direct sunlight, therefore affecting the median lux values achievable. However, the lux value of the kitchens only falls minimally below the target value. Moreover, the supplied lux gradient contours confirm that the rooms enjoy a good, even spread of diffuse light, each served by its own aperture offering a direct view to outside and should be regarded as pleasant, likeable spaces. As such, suitable mitigation has been proposed to address this shortfall.
- 5.18. Adequate sunlight exposure for the rooms has also been provided, out of a total of 21 main living areas tested, 20 achieve the BRE recommended targets for sunlight exposure, with suitable mitigation measures proposed for the shortfall of one room. Additionally, the report also outlines that, collectively, the properties' external amenity spaces receive ample sunlight exposure throughout the day and across seasons, satisfying required standards and BRE guidance when viewed as a whole.
- 5.19. Overall, the report demonstrates that the design of the proposal works well and to its strengths whilst working within the confines of the surrounding environment, identifying that suitable mitigation measures have been proposed for any shortfalls. In this regard, daylight and sunlight will not affect the amenity of future residents. The report therefore aligns with policy **DMHB 11** (Design of New Development) and Policy **BE1** (Built Environment) and NPPF paragraph **130**.

Overheating Analysis

- 5.20. An Overheating Analysis Assessment has been conducted by Eight Versa to provide design stage guidance and to maximise occupant comfort levels.
- 5.21. The report illustrates that the scheme has implemented passive design measures, and that the scheme is compliant with the overheating requirements as set out in CIBSE TM59 and Part O.

5.22. The report states that, in line with the requirements set out in CIBSE TM59, the *'the proposal maximises passive design measures by responding to the local context in the following ways:*

- *Energy efficient lighting and appliances have been recommended to reduce internal heat gains*
- *The building fabric will be insulated over and above the standards set out by Building Regulations and reduced solar gains from a glazing solar factor of 0.4 (or 0.3 for obscure windows) will help to keep heat out of the building*
- *Fixed shading and overhangs as per architectural drawings*
- *Mechanical ventilation with heat recovery and summer bypass to provide fresh air and purging of heat*
- *Natural ventilation to supply fresh air to the building through openable windows (as per ventilation rates section of this report and Appendix C).*
- *Ventilation louvres next to some ground floor bedroom windows, that provide ventilation during the night.*

5.23. As such, the proposal is considered to be compliant with Policy **SI 4** (Managing Heat Risk) of the London Plan 2021.

Fire Safety

5.24. A Fire Statement form has been prepared by Robson Frankham and identifies that there are no specific issues, technical complexities or risks that might affect the fire safety of the development.

5.25. Key points outlined within the form include that the fire service vehicle access will be available via the main entrance of the building from the existing surrounding roads. In addition, the fire appliance will be able to park directly outside the front of all houses and within 45m from the further point of the house, illustrating that the layout of the proposed buildings will follow current standards. Private fire hydrants will also be provided across the development and there is also an emergency vehicle tracking route within the Site.

5.26. Overall, the report identifies that the Site is compliant with Policy **D12** (Fire Safety) of the London Plan.

Neighbouring Amenity

5.27. Whilst the proposed development represents an increase in density and scale, it has been designed to respond and respect to the amenities of neighbouring residents. Given the separation distances between the proposed development (in particular Blocks B and C) and 9 and 10 Chamberlain Lane and 114-128 Haydon Drive (along with the use of obscure windows) this will ensure the amenities of neighbouring residents are not unduly impacted (e.g. in terms of privacy and outlook).

5.28. Rapleys has also prepared a report, submitted alongside this Statement, which analyses the impact of Daylight and Sunlight on neighbouring properties. The analysis confirms that the development will maintain satisfactory daylight and sunlight distribution for neighbouring properties, addressing the required guidelines. The report further outlines that 'there is no Daylight and Sunlight related reason why planning permission should not be granted in this instance', concluding that the development is in accordance with DMHB 11 (Design of New Development), Policy BE1 (Built Environment) and NPPF paragraph 130.

5.29. The development design has improved the general vicinity of the Site for future residents and the surrounding community through enhanced connectivity, safety, and associated landscaping. Key features include active frontages along all public paths and a distinct pedestrian and vehicle access. The development is, therefore, is considered compliant with **DMHB 11** (Design of New Development), **DMHB 12** (Streets and Public Realm), **DMHB 15** (Planning for Safer Places) and **DMHB 14** (Trees and Landscaping).

5.30. The development complies with Policy **DMHB 19** (Play Space), which requires new major residential developments to provide on-site play facilities for children and young people by providing a new children's play area located on the edge of the northern edge of the Site. This upgraded communal outdoor space will be accessible via Joel Street. As such, the communal space will become a prominent public nodal point, defined by a new frontage and an enhanced public realm for both residents and the local community to enjoy, aligning with local plan Policy **DMHB 12**.

Transport

Transport Assessment

5.31. The Transport Assessment was carried out by Motion to provide transport and highways advice in support of the Proposed Development. The report demonstrates that the Site is located within an accessible location with good access to sustainable transport provisions. In addition, the Site is close to a range of key local amenities.

5.32. The report outlines that each dwelling will be provided with a refuse store, and all servicing will occur on Site with vehicles entering and exiting in a forward gear.

5.33. The findings outline that the Proposed Development will not generate a significant number of trips and as such will not act to have a detrimental impact on the local highway network.

5.34. The results of the assessment therefore highlight that the Proposed Development is considered acceptable from a transport perspective.

Travel Plan (TP)

5.35. The TP was also carried out by Motion to offer a strategy for managing multimodal access to the Site. This TP focused on maximising the potential for travel by sustainable modes of transport.

5.36. The primary objectives of the strategy outlined within the TP are as follows:

- *To minimise the need to travel to and from the Site*
- *Reduce single occupancy vehicle car trips to and from the Site*
- *Promote walking and cycling to and from the development and encourage the use of public transport.*

5.37. The report covers the Current Travel Patterns, Travel Plan Administration, Travel Plan Measures and Plan Monitoring and Review, and will be accessible to all necessary individuals party to the Proposed Development. The report advises that a Travel Plan Co-ordinator (TPC) will be appointed and funded to oversee the management, development, implementation, monitoring, reviewing, and reporting of the TP.

Access

5.38. Vehicular access to the Site will continue to occur via Haydon Drive leading onto Joel Street. Pedestrian access to the site will occur through the existing right of way public footpath to the north of the Site and the incorporation of the two existing pedestrian access points from Joel Street along the western boundary into the scheme.

Parking

5.39. The assessment outlines that 31 car parking spaces will be provided at the Site. This equates to 1.5 spaces per dwelling. LBH standards outline a maximum of 2 spaces per dwelling, while London standards equate to 1.5 per dwelling, therefore the Proposed Development is in accordance with both the London Borough of Hillingdon and London Plan parking standards.

5.40. In addition, the minimum cycle parking standards for the Site sets out that there is a minimum provision of 2 spaces permitted by dwelling, equating to the proposed provision of 42 cycle parking spaces. It is proposed that each dwelling will be provided with a secure and sheltered cycle store (with capacity for 2 bikes) which will ensure cycle parking is accommodated for each dwelling in line with local standards.

5.41. Based on the points made above regarding accessibility and transport on Site, the proposal is compliant with policy **T1** (Strategic Approach to Transport), **T4** (Assessing and Mitigating Transport Impacts), **T5** (Cycling) and **T6** (Car Parking) of the London Plan and polices **DMT 6** (Vehicle Parking) and **DMT 5** (Pedestrians and Cyclists) of the Hillingdon LP.

Flood Risk and Drainage

5.42. A Drainage Statement prepared by SD Engineers has been submitted alongside this planning statement, which concludes that the Site is at low risk from all sources of flooding.

5.43. The Proposed Development will drain the flows from the impermeable areas within the Site via gravity into attenuation tanks and permeable paving, where flow rates are to be controlled via a HydroBrake. Due to the Site's slope, the attenuation tanks have been designed as cascading with flow controls throughout the system. The surface water will then be drained via gravity into the existing watercourse located 70m east of the Site.

5.44. Permeable paving will be utilised in the parking bays, footpaths and hard landscaping within the gardens. This allows for further control of the flow rate and additional attenuation.

5.45. The report also outlines that the Development Proposal will equate to 5.4 l/sec foul water flows which will be flow into the Thames Water public foul water sewer.

5.46. The report concludes that long term maintenance of all networks and features will be undertaken by the maintenance company assigned to the development. As such, the report demonstrates that, from a strategy level, the Proposed Development is viable from a drainage perspective, and that it is in line with Local Policy **DME1 9** (Management of Flood Risk) and **DME1 10** (Water Management, Efficiency, and Quality) and NPPF paragraph **164**.

Energy

5.47. An Energy Assessment was undertaken by Eight Versa to assess whether the scheme aligns with both national and local requirements.

5.48. A sample of houses were modelled for the purposes of the energy assessment. One of each dwelling type from Blocks A, B, C, and D were analysed.

5.49. The report outlines that '*high energy efficiency performance building services have been used for these units to achieve the required carbon emission targets.*' The report thus demonstrates that the scheme complies with the 2021 Building Regulations Part L and the minimum efficiency targets have been followed.

5.50. The results of the CO₂ emission assessment outlines that Proposed Development meets an on-site CO₂ reduction of 80% beyond Building Regulations. This has been achieved through energy efficiency measures and the inclusion of renewable technologies, including Air Source Heat Pumps and PV Panels.

5.51. In line with the energy hierarchy outlined within the London Plan (2021), the Proposed Development will address the 'Be Lean' stage and provide a CO₂ improvement of 22% through energy efficiency measures. Regarding the 'Be Green' Stage, the site will achieve a further improvement of 58% CO₂ through renewable technologies.

5.52. To achieve the zero-carbon target the Proposed Development will make a cash in lieu contribution to the borough's carbon offset fund of £17,546.

5.53. The report concludes that the scheme meets and, in some cases exceeds, the standards set out in the by Hillingdon Local Policy **DME1 2** (Reducing Carbon Emissions), London Plan (2021) policy **SI 2** (Minimising Greenhouse Gas Emissions), alongside the guidance of Hillingdon's Sustainable Design and Construction SPG, and the overriding environmental objective of the NPPF.

Sustainability

5.54. A Sustainability Statement, was undertaken by Eight Versa, and outlines that the Proposed Development will adhere to Local Policy with regards to Energy and CO2, Adaption to Climate Change, Waste, Construction management, Water Efficiency, Transport and Connectivity, Sustainable Materials, Health and Wellbeing and Land Use and Ecology, providing a development that reflects '*the holistic nature of sustainable development in Hillingdon*'.

5.55. The report concludes that: '*the development will adopt the following sustainable features:*

- *The proposed development will reduce carbon emissions by 22% from the fabric energy efficiency measures described in the 'Be Lean' section and will reduce total carbon emissions by 58% over Building Regulations, using draft SAP 10.2 carbon factors.*
- *Reduce energy consumption by targeting improved U-values and airtightness. Low energy lighting will be specified.*
- *Implement a site waste management plan and stringent resource efficiency benchmarks.*
- *Follow best practice policies in terms of air, water and ground pollution and appoint a contractor who will register for the Considerate Constructors Scheme.*
- *Achieve a water consumption target of 105 litres/person/day through the implementation of low water-consuming fittings.*
- *Utilise sustainable transport, including access to public transport and inclusion of cycle storage facilities.*
- *Minimise embodied carbon through efficient design, procurement of materials from a local source, or with a high-recycled content.*
- *Be of high build quality, surpassing the minimum Building Regulations.*
- *Ensure all materials are responsibly sourced and of low environmental impact where feasible.*
- *Consider health and wellbeing through design and operational procedures, including daylight, optimum indoor air quality and thermal comfort.*
- *Protect and enhance the ecological value of the site by introducing a green roof and mixed native species planting.'*

5.56. Overall, the report demonstrates that the proposed development aligns with Local Policy DMEI 2 (Reducing Carbon Emissions), DMEI 3 (Decentralised Energy), Policy EM11 (Sustainable Waste Management), Policy DMEI 13 (Importation of Waste Material), DMEI 7 (Biodiversity Protection and Enhancement), DMEI 9 (Management of Flood Risk) and DM10 (Water Management, Efficiency and Quality).

Trees

5.57. An Arboricultural Impact Assessment and Tree Survey were undertaken by Trevor Heaps to identify all trees which may be affected by the Proposed Development. An assessment of the impact on the affected trees was also conducted, and recommendations were provided to ensure the continued health and preservation of the retained trees.

5.58. The report identifies that the proposals will require the removal of one small Horse Chestnut and three Crab Apple trees. The report states that '*Neither of these trees are particularly valuable, and neither the amenity nor the arboreal character of the local area will be affected by the removal*'. To mitigate the loss of these trees, numerous new trees and shrubs will be planted, in accordance with current British standards.

5.59. An Arboricultural Method Statement (AMS) was also carried out by Trevor Heaps to outline a methodology for all construction works that may influence significant trees and further recommendations for arboricultural supervision. The AMS and the Tree Protection Plan will be issued to the building contractor so that the report can be integrated into their work schedule. The AMS and Tree Protection Plan will also be made available on-site for the duration of development.

5.60. The statement was conducted in line with British Standards (BS 5837:2012) and concluded that with the measures outlined addressed, the proposals will not detrimentally affect the trees and, with the further well thought out tree planting and landscaping scheme, will improve and enhance the character, appearance and biodiversity of the local area. As such the development is in accordance local plan policy **DMHB 14** (Trees and Landscaping) and paragraph **136** and **166** of the NPPF.

Ecology & Biodiversity Net Gain

5.61. A Preliminary Ecological Appraisal was undertaken by Middlemarch to identify all trees which may be affected by the Proposed Development. The assessment methodology included an ecological desk study and a walkover study to '*determine the features of ecological importance*

on site as well as a preliminary assessment of the potential impacts the Proposed Development could have on these features'.

5.62. The findings identify that the '*key ecological features in proximity to the Site include Haydon Hall Meadows SINC. They also identify that, 'within the Site, the most notable features comprise the trees, hedge and dense scrub. These habitats contribute to the structural and species diversity of the Site and have the potential to support a variety of fauna. The semi-mature to mature trees also have intrinsic ecological value and are irreplaceable in the short to medium term. The Site has the potential to support a range of wildlife, including amphibians, bats, badgers, hedgehogs, birds, reptiles and invertebrates.'*

5.63. The report outlines a series of measures to protect the wildlife and biodiversity on the Site, while also identifying opportunities for ecological enhancement. The proposed measures include:

- Consultation with the LPA to discuss measures to safeguard Haydon Hall Meadows SINC (Borough Grade I) and to ensure appropriate measures are included within the Construction Ecological Management Plan (CEcMP) for the Site.
- The avoidance/minimisation of the loss of trees, hedges and dense scrub, and the incorporation of habitats into the landscaping scheme.
- Compensation for any habitat loss on the Site, including the planting of native trees and hedges, the creation of flower-rich grassland margins, the installation of bird nest boxes on existing trees and the proposed building, as well as bat boxes on the new buildings and existing trees.
- Compliance with national requirements for a 10% Biodiversity Net Gain to improve the local environment.
- Conducting a further survey/assessment, including a Preliminary Bat Roost Assessment of buildings and a Ground-Level Tree Assessment for roosting bats.
- The production of a CEcMP for the Site setting to safeguard and provide appropriate working practices that will minimise adverse effects of biodiversity and ensure compliance with UK Wildlife Legislation.

5.64. A Biodiversity Statement & Metric Assessment was also undertaken by Middlemarch using 'The Statutory Biodiversity Metric' and associated User Guide.

5.65. The report notes that the Site contained no irreplaceable habitat on-site at baseline. Regarding habitat units, hedgerow units and watercourse units, the proposed development will result in a

total net unit change of 0.20 (6.58%) for habitat units, 0.32 for hedgerow units and 0 for watercourse units.

5.66. The UK mandatory minimum is a 10% net gain in biodiversity for development. Although the Proposed Development will result in a small 0.10-unit deficit in habitat units, the report concludes that: *'all options to maximise the biodiversity net gain provided on site have been implemented and the overall strategy introduces a significant increase in native planting and new trees. Furthermore, most of the existing trees on site will be retained, including those located along the northern site boundary, which are likely to be of greatest ecological value. Therefore, the proposals are considered to provide the best possible results for biodiversity on site, whilst offsite compensation measures (such as the purchasing of biodiversity units) will be explored to ensure that a 10% net gain in area habitat units is met.'* The report outlines a series of recommendations to support this.

5.67. In summary, the target net gain percentage will be achieved through on-site hedgerow and habitat units, supplemented by 0.10 off-site habitat units.

5.68. In conclusion, with the appropriate mitigation measures outlined in the report, the proposals will not negatively impact the ecology and biodiversity of the Site. Instead, they will improve and enhance the character, appearance, and biodiversity of the local area. As such the development is in accordance local plan policy **EM7** (Biodiversity and Geological Conservation) and **DME1** Biodiversity {Protection and Enhancement} and paragraph **187** of the NPPF.

Air Quality

5.69. The application is supported by an Air Quality Assessment, prepared by Eight Versa. The purpose of the report is to determine baseline conditions, consider location suitability for the proposed end-use and assess potential effects associated with the scheme.

5.70. The development has a medium risk of unmitigated risk to local sensitive receptors from emissions of dust and pollution from construction. However, the report outlines that risk will be *'mitigated further through the measures set out in the Air Quality & Dust Management Plan (AQDMP), which will be implemented through the contractor's Construction Environmental Management Plan (AQDMP)'*. With the outlined mitigation measures in place, the residual effects arising from the construction phase of the proposed development would be deemed 'low'.

5.71. The report identified that resident amenity spaces will not be exposed to high levels of pollution and that the scheme aligns with Air Quality Neutral (AQN) guidance.

5.72. While not required, further mitigation measures to reduce occupant exposure to pollutants were explored and applied within the assessment, following the design mitigation hierarchy, to maximise air quality for future occupants where feasible. Measures include the provision of sustainable transport modes, such as integration of low carbon energy technologies, urban greening and a well-designed mechanical ventilation system.

5.73. Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development. As such, the development is in accordance with local Policy **SI1** (Improving air quality) and paragraph **186** of the NPPF.

Ground Conditions and Contamination

5.74. A Soil and Ground Investigation report was undertaken by Soils Limited and identified that '*based on the information obtained during the compilation of this Preliminary Investigation and the preliminary conceptual Site model, a potential for a very low to low risk of contamination has been identified*'. The report also outlines that the Site is at very low risk of unexploded ordnance.

5.75. The report concludes that further Environmental investigations should be conducted into Investigatory holes, laboratory testing and risk assessment. With these assessments addressed the Proposed Development aligns with Policy **DMEI 12** (Development of Land Affected by Contamination) and paragraph **196** of the NPPF.

6. Conclusion

- 6.1. This Statement is submitted in support of a full planning application concerning the land on Haydon Drive to redevelop and enhance an underutilised Site that lies within a predominant area of Eastcote, Hillingdon.
- 6.2. The development proposal comprises the demolition of the existing bungalows and the redevelopment of the Site with 4 residential dwelling types consisting of 3-to-4-bedroom properties.
- 6.3. The scale and extent of the proposed building satisfactorily makes efficient use of the land whilst not representing an overdevelopment of the Site, particularly given its suburban nature. The proposals seek to enhance the character of the area by providing a high-quality and affordable development of an appropriate scale. The scheme has been sensitively designed so as not to detract from the amenity enjoyed by neighbouring residents together with providing an attractive environment for future occupiers while addressing local housing need. The development incorporates sustainable design and construction principles.
- 6.4. It has been demonstrated within this Statement and all supporting technical reports and surveys that the Proposed Development would be consistent with the relevant areas of policy within the adopted Development Plan and all other material considerations, including the NPPF.
- 6.5. It is therefore respectfully requested that planning permission for the Proposed Development is approved subject to any conditions that the Local Planning Authority considers are necessary and appropriate.