



PLANNING STATEMENT

REDEVELOPMENT OF SITE TO PROVIDE 41 FLATS

**FORMER VICTORIA PUBLIC HOUSE, 32 NORTH HYDE ROAD, UB3 4NE AND
SANDOW GARAGE SITE, SANDOW CRESCENT, HAYES, UB3 4QH**

DECEMBER 2021

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1.0 INTRODUCTION

1.1 This Planning Statement is written in support of a planning application for demolition of the existing buildings and erection of two blocks of 41 flats (4 x studio, 7 x 1 bed, 20 x 2 bed, and 10 x 3 bed) with 5 disabled parking spaces and vehicular access off North Hyde Road, Hayes. It's submitted on behalf of joint applicant's, North Hyde Investments Limited who own the former Victoria Public House site, and FJC Developments Limited who own the Sandow Garages site.

1.2 The proposals should be read in conjunction the following drawings and reports:

- Architectural Plans by Create Architects:

0100/Rev 1	Site Survey Plan
0110/Rev 0	Victoria Pub Existing Plans
0100/Rev 4	Site Plan
0100/Rev 3	Block Plans 1
0100/Rev 3	Block Plans 2 (Plan 1)
0100/Rev 3	Block Plans 2 (Plan 2)
0100/Rev 2	Landscape Plan
0100/Rev 4	Proposed Ground Floor Plan
0101/Rev 4	Proposed First Floor Plan
0102/Rev 4	Proposed Second Floor Plan
0103/Rev 4	Proposed Third Floor Plan
0104/Rev 4	Proposed Roof Level
0200/Rev 3	Elevations Block 1
0201/Rev 2	Elevations Block 2
0200/Rev 4	Proposed Site Elevations
0800/Rev 4	Axonometric View 1
0800/Rev 4	Axonometric View 2
0800/Rev 4	Axonometric View 3
0800/Rev 4	Axonometric View 4

- Design & Access Statement dated November 2021 by Create Architects;
- Transport Statement dated December 2021 by I-Transport LLP;
- Travel Plan dated December 2021 by I-Transport LLP;
- Daylight and Sunlight Report dated December 2021 by Right of Light Consulting;
- Tree Survey, Arboricultural Impact Assessment and Arboricultural Method Statement dated December 2021 by Challice Consulting;
- Noise Assessment dated December 2021 by Hawkins Environmental Limited;
- Air Quality Assessment dated December 2021 by Hawkins Environmental Limited;
- Sustainability and Energy Statement dated December 2021 by Maven Sustainability;
- Flood Risk Statement and Drainage Strategy dated December 2021 by Ardent Consulting Engineers;
- Fire Safety Statement dated December 2021 by BB Seven;
- Contaminated Land Risk Assessment dated December 2021 by STM Environmental;
- Viability Appraisal dated December 2021 by Kempton Carr Croft;
- 3 x Computer Generated Images by HD Marketing.

2.0 SITE DESCRIPTION

2.1 The site is on the northern side of North Hyde Road close to its intersection with Station Road, the main road leading into Hayes Town Centre.

2.2 The northern portion of the site is L-shaped and comprises a series of mostly vacant single-storey garages and office/workshops accessed off Sandow Crescent while the southern portion is accessed off North Hyde Road and comprises the former Victoria Public House which has been converted into 7 flats.

2.3 The site is irregular in shape and surrounded by:

- The rear gardens of the two-storey maisonettes fronting Nestles Avenue to the north;
- The rear gardens of the two-storey maisonettes fronting Sandow Crescent to the north-east and a two-storey block of flats with associated parking and amenity space to the south-east fronting North Hyde Road;
- North Hyde Road to the south on the other side of which are two-storey detached and semi-detached houses;
- A three-storey block of flats to the west fronting North Hyde Road, to the north of which is the two-storey Hayes Medical Centre fronting Old Station Road and a children's nursery at the corner of Old Station Road and Nestles Avenue.

2.4 Further beyond the site to the east is an Esso garage and a series of 4-storey flatted blocks fronting North Hyde Road while to the north on Nestles Avenue is the Barrett Homes 'Hayes Village' development which is currently under construction with buildings ranging from 4-storeys along the street frontage up to 10-storeys further into the site. To the west of the site, visible in views along North Hyde Road as you approach the site from the east, is the 4-storey Premier Inn at the corner of North Hyde Road and Millington Road.

2.4 The site has a Public Transport Accessibility Level (PTAL) of 5, with 0 being the lowest and 6b the highest, being within 200m of bus stops on North Hyde Road and Station Road and 500m of Hayes and Harlington Station, a future Cross Rail Station.

2.5 In terms of open space, the River Crane nature reserve is approximately 700m to the east. There is also a Tesco Express and ASDA supermarket within 100m to the east and west as well as a range of shops and services within Hayes Town Centre approximately 300m to the north. The site therefore has excellent access to public transport, open space and local shops and services.

3.0 SITE DESIGNATIONS

3.1 The site lies in the Hayes Housing Zone on the Hillingdon Local Plan Policies Map (2020) but otherwise has no designations.

3.2 It is not in a conservation area and there are no listed buildings on or close to the site.

3.2 The site lies in Flood Zone 1 on the Environment Agency Flood Map, indicating a low (less than 1 in 100 year) annual probability of flooding.

4.0 RELEVANT PLANNING HISTORY

The Victoria Public House, 32 North Hyde Road, Hayes, UB3 4NE

4.1 In 2015 planning permission was granted for the conversion of the public house into 5 x 1 bed and 2 x 2 bed flats under Planning Ref: 21432/APP/2015/2629. The permission has been implemented and represents the existing use of the site.

4.2 In 2016 the Council issued pre-application advice in respect of a 4-storey building comprising 25 flats with basement parking. The pre-application advice concluded:

- The proposed development would make better use of the site by intensifying the residential use in compliance with the NPPF and London Plan;
- The proposed development has a residential density of 159 units per hectare and 414 habitable rooms per hectare which would be within the middle range of acceptability for this site;
- The site layout with a centrally located replacement building and access road positioned along the eastern boundary leading to the basement car park is acceptable and would allow the site to be comprehensively re-developed;

- The proposed building would need to be set back further into the site to reduce its dominance along North Hyde Road.

4.3 In 2017 a planning application was submitted for demolition of the existing building and erection of a 4-storey building with basement to provide 21 flats (9 x 1, 8 x 2, and 4 x 3 bed) with 23 parking spaces (21 in the basement and 2 at grade) under Planning Ref: 21432/APP/2017/1334. A financial viability appraisal was submitted with the application which concluded the scheme could not support any affordable housing. However, the Council raised the following concerns with the scheme:

- The basement car park should be removed in favour of surface level parking which would provide more scope for affordable housing;
- Given the sites location within a Housing Priority Zone there is some flexibility on parking standards;
- A separation distance of 21m should be provided between facing habitable room windows and 15m to any flank elevations;
- Circa 20% of the units should be family units of 3 or more beds;
- The proposal should be compliant with the London Plan amenity space standards (5sqm for a 1 bed 2 person dwelling and an extra 1sqm for each additional occupant). Hillingdon standards should be achieved where possible (20sqm for 1 bed, 25sqm for 2 bed and 30sqm for 3 bed), comprising a mix of private and communal space. If there is a shortage, contributions towards offsite provision may be acceptable;
- There is the potential to increase the height of the building subject to the upper 2 floors being recessed and of an appropriate design;
- The frontage of the building could be moved closer to the highway to align with the property to the east.

Land at Venns Yard, Sandow Crescent, Hayes, UB3 4QH

4.4 In 1981 permission was granted for the continued use of some of the garages for storage (Planning Ref: 879/F/80/1606).

4.5 In 1981 temporary permission was granted for the retention and change of use of some of the buildings to offices (Planning Ref: 879/F/80/1607). This permission was renewed in 1983, 1986, 1990 and 1995 but has since lapsed.

4.6 In 2017 planning permission was refused for the erection of 7 x 3 bed two-storey dwellings with 10 parking spaces under Planning Ref: 879/APP/2017/1462. The reasons for refusal were:

- 1. Inadequate access width for pedestrian and vehicles and opportunities for on-site turning, particularly for service and refuse vehicles;*
- 2. Inadequate internal unit sizes;*
- 3. Inefficient and piecemeal development of a highly accessible site within the Hayes Housing Zone, prejudicial to the redevelopment potential of other adjoining sites.*

4.7 In 2018 planning permission was refused at local level and appeal for the erection of 7 x 3 bed two-storey dwellings with 12 parking spaces under Planning Ref: 879/APP/2018/540. The application was refused for the same reasons as above and the Inspector subsequently dismissed the appeal for the following reasons:

- 1. The density of the scheme, at 43u/ha, is below the anticipated minimum of 50u/ha for suburban location as set out under the London Plan and represents an underdevelopment of a site that is capable of accommodating flats at a higher density, particularly given its location within the Hayes Housing Zone.*

2. The sites awkward layout restricts its ability to optimise its development potential, however the site could be amalgamated with some of the neighbouring sites such as the medical centre to the west and public house to the south to allow for a more comprehensive development which maximises the sites potential and allows for direct access to the public highway.

3. The proposed access width combined with the constrained entry and exit onto Sandow Crescent make it unsuitable for vehicular, pedestrian and servicing access.

- 4.8 In 2018 planning permission was refused for an amended application for the erection of 5 x 3 bed two-storey dwellings and a detached two-storey building comprising 2 x 1 and 1 x 2 bed flats with 11 parking spaces under Planning Ref: 879/APP/2018/3557. The application was accompanied by a Transport Statement which sought to address the previous highway reasons for refusal. Notwithstanding this, the application was refused for the following reasons:

1. The proposal represents an inefficient and piecemeal form of development within a highly accessible location within the Hayes Housing Zone which fails to protect the development potential of adjoining sites.

2. The proposal fails to provide an acceptable access into the site that is suitable for large vehicles and pedestrians.

5.0 PRE-APPLICATION DISCUSSIONS

Combined Site (Victoria Pub and Sandow Crescent)

- 5.1 In 2020 pre-application advice was sought for the comprehensive redevelopment of the application site (comprising the former Victoria Public House site and the Sandow garages site) to erect two separate 4-storey buildings together with a lower scale 2-storey building above some parking spaces along the eastern boundary comprising 41 units (10 x 1, 24 x 2, and 7 x 3 bed) with 31 parking spaces accessed off North Hyde Road. The Council made the following comments in their response of the 12 August 2020 (Ref: 21432/PRC/2020/71):

- While not listed or within a conservation area, the former public house makes a positive contribution to the street scene and should ideally be incorporated into any redevelopment. If this is not possible it should be recorded (by condition) to Historic England prior to demolition;
- Block A (fronting North Hyde Road) is 3-storeys with a recessed fourth floor and is of a bulk and mass that respects this part of the townscape. However, it's sited very close to the western boundary which results in some awkward spaces and it's unclear if it achieves a 21m separation distance to the neighbouring windows to the west. The two-storey element adjacent to the access road containing the bin and cycle store also provides an unwelcoming entrance to the development and should be removed or redesigned;
- Block B (positioned above the parking spaces along the eastern boundary) is considered to provide a poor relationship to the adjoining properties and is not supported;
- Block C (located at the rear) could be improved if its height and bulk were reduced to be more compatible with the neighbouring two-storey houses;
- A reduction in units arising out of the above comments will reduce the number of parking spaces and free up more space for landscaping and private and communal amenity space;
- Although the site is not subject to a TPO there are several trees on or adjoining the site so an arboricultural impact assessment should be submitted with any future application;
- There are concerns that the proposal will overlook and have an overbearing impact on the properties along Nestles Avenue, Sandow Crescent and North Hyde Road. In this respect, the submission will need to clarify the position of the existing habitable room windows on these properties and demonstrate that separation distances of 21m are achieved;

- A sunlight and daylight report should be submitted to demonstrate there will be no unacceptable sunlight, daylight, or overshadowing impacts;
- The Council's amenity space standards require the following [in the form of combined private and communal amenity space]:

1 bed – 20sqm

2 bed – 25sqm

3 bed – 30sqm

- 1 parking space per unit should be provided unless a lesser number is suitably justified. 10% of all spaces should be disabled and 20% should have active electrical charging points;

5.2 In 2021 pre-application advice was sought for an alternative scheme. Two design options were presented; one showing a 4-storey block with butterfly roof at the front with two smaller 3-storey blocks at the rear; the other showing a 4-storey block with butterfly roof at the front and a single 3-storey block at the rear. Both options proposed 25 parking spaces. The Council made the following comments in their pre-application response of 16 September 2021 (Ref: 21432/PRC/2021/136):

- There is no in-principle objection to the redevelopment of the site for residential use. However, if there are any employment uses on the site the applicant will need to justify their loss under Policies DME 2 of the Local Plan and E7 of the London Plan;
- The development should provide a minimum 35% affordable housing split 70% social/affordable rent and 30% intermediate, unless a lesser amount can be justified by way of a viability appraisal;
- The proposal should aim to provide at least 25% of the units as family sized units of 3 or more bedrooms;
- The height, bulk, scale, and mass of the 4-storey block to the front is broadly acceptable, subject to the upper floor being recessed and the butterfly roof being replaced with a flat roof;
- The 7 parking spaces in the front setback area adjacent to North Hyde Road would detract from the setting of the front block and should be replaced by more soft landscaping;
- The option which proposed two blocks at the rear was considered unacceptable as it resulted in a cramped layout with inadequate separation distances between the two blocks and adjacent dwellings;
- The option which proposed a single block at the rear was favoured but concerns were still raised about its cramped site layout, particularly given the predominance of parking in the centre of the site and the subsequent inability to provide sufficient landscaping and setting space. Concerns were also raised about potential overlooking to neighbouring properties with officers suggesting a minimum setback of circa 7m to the western boundary where it abuts the medical centre car park to allow this site to be redeveloped in the future to achieve separation distances of 15m to any flank elevation or 21m to any facing habitable room window on this site. Separation distances of 15m to flank or 21m to habitable rooms should also be achieved to the houses to the north and east;
- In respect of the medical centre to the west, the Council also suggested any future application should be submitted with an indicative masterplan in the Design & Access Statement to demonstrate how it could be redeveloped in the future alongside the proposed scheme;
- Given the site's high PTAL rating of 5, a low car housing scheme was recommended which restricts parking to disabled persons only.

6.0 DESCRIPTION OF PROPOSED DEVELOPMENT

- 6.1 The proposal has been amended to incorporate these comments and now proposes demolition of the existing buildings and erection of two blocks of 41 flats (4 x studio, 7 x 1 bed, 20 x 2 bed, 10 x 3 bed) with 5 disabled parking spaces accessed off North Hyde Road.
- 6.2 Block A (fronting North Hyde Road) would be 4-storeys with a flat roof with the upper floor recessed behind the main facade. It would contain 16 flats (2 x 1 bed, 6 x 2 bed, and 8 x 3 bed) accessed via a centrally positioned door facing North Hyde Road.
- 6.3 On the ground floor would be 4 flats; 2 facing the street and 2 facing the rear, each with private gardens ranging between 20 and 23sqm. An enclosed bin store would also be located on the eastern side accessed from the shared surface driveway.
- 6.4 The first and second floor would have a similar layout, with each flat served by balconies facing the front and rear ranging from 7 to 9sqm.
- 6.5 The top floor would contain 4 smaller flats and be set back from the main facade, with the setback areas providing amenity space ranging from 16 to 20sqm per flat.
- 6.6 Block B would be positioned at the rear of the site and would have an L-shaped layout to reflect the shape of this part of the site. It would be part 3, part 4-storeys with a flat roof and contain 25 flats (4 x studio, 5 x 1 bed, 14 x 2 bed, and 2 x 3 bed). There would be 8 flats per floor for the lower three floors and a single penthouse apartment and communal space on the upper floor. Access into this block would be from the east and west so residents can enter the building either via the internal pedestrian path or by the new public path linking North Hyde Road to Nestles Avenue.
- 6.7 The flats at the southern end of this block would have a predominantly south facing orientation looking back towards the front block with the remaining flats having a predominantly east or west orientation to ensure good sunlight/daylight and prevent any north facing single aspect units.
- 6.8 On the ground floor, all the flats would have private gardens ranging between 18 and 62sqm while at first and second floor level all flats would have balconies ranging between 7 and 9sqm. The penthouse apartment on the top floor would be set in from the main facade and have a private terrace of 16sqm looking south towards the front block. A communal room of 42sqm together with a covered terrace and roof garden of 110sqm would also be provided at this level, again heavily recessed from the main façade.
- 6.9 A refuse storage area would be positioned within this block close to the eastern entrance and internal path to allow ease of access for residents and refuse operatives.
- 6.10 Unlike the earlier pre-application schemes, a low car housing scheme is now proposed with only 5 disabled parking spaces to reflect the site's highly accessible location and position within the Hayes Housing Zone. This has resulted in a more spacious layout and landscaped setting, with the two blocks now separated by generous green spaces containing children's play equipment, seating areas and landscaping.
- 6.11 Cycle parking would be provided throughout the site, including along the northern and eastern boundaries and within the landscaped gardens between the two blocks.
- 6.12 The 7 parking spaces previously proposed at the front of the site have now been removed in favour of a single disabled car space with more landscaping to soften the impact of the built form and improve the street scene.
- 6.13 A new pedestrian link is also proposed along the western side of the site linking North Hyde Road to Nestles Avenue. This route has become overgrown and unused and its reopening and natural surveillance from the proposed buildings will be a key public benefit of the scheme.
- 6.14 In terms of materials, the main part of the building will be brick with the recessed upper floors clad in a lightweight material. The windows and doors will be high-quality aluminium and the balustrades would be metal (refer to Design & Access Statement for further details).

- 6.15 A green roof is proposed to each block with some of the roof areas also covered with PV panels to maximise the sustainability of the scheme.
- 6.16 Refuse and servicing would all take place on-site with suitable space for vehicles to enter, stand, and exit in forward gear (refer to Transport Statement for further details). In order to facilitate the repositioning of the existing crossover at the south-east corner of the site the existing traffic island on North Hyde Road would be repositioned and the redundant crossovers reinstated, secured by way of a legal agreement.

7.0 RELEVANT PLANNING POLICIES

- 7.1 The relevant planning policies applicable to the scheme are contained within:

- The National Planning Policy Framework (2021);
- The London Plan (2021);
- The Hillingdon Local Plan Part 1: Strategic Policies (2012);
- The Hillingdon Local Plan Part 2: Site Allocations and Designations (2020); and
- The Hillingdon Local Plan Part 2: Development Management Policies (2020).

- 7.2 A summary of the most relevant policies are set out below:

The National Planning Policy Framework (2019)

- 2.0 Achieving Sustainable Development
- 5.0 Delivering a Sufficient Supply of Homes
- 8.0 Promoting Healthy and Safe Communities
- 9.0 Promoting Sustainable Transport
- 11.0 Making Effective Use of land
- 12.0 Achieving Well Designed Spaces
- 14.0 Meeting the Challenge of Climate Change and Flooding

The London Plan (2021)

- G1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- D3 Optimising site capacity through the design-led approach
- SD1 Opportunity Areas
- D1 London's form, character and capacity for growth
- D3 Optimising site capacity through the design-led approach
- D4 Delivery good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D12 Fire Safety
- D14 Noise
- H1 Increasing housing supply
- H2 Small sites
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H8 Loss of existing housing
- E1 Offices
- E4 Land for industry, logistics and services to support London's economic function
- E7 Industrial intensification, co-location and substitution
- H10 Housing size mix
- G5 Urban Greening
- G7 Trees and woodlands

SI1	Improving air quality
SI2	Minimising greenhouse gas emissions
SI4	Managing heat risk
SI12	Flood risk management
SI13	Sustainable drainage
T1	Strategic approach to transport
T5	Cycling
T6	Car Parking
T7	Deliveries, servicing and construction
DF1	Delivery of the Plan and Planning Obligations

The Hillingdon Local Plan Part 2 Development Management Policies (2020)

H1	Safeguarding Existing Housing
H2	Housing Mix
H4	Residential Conversions and Redevelopment
H7	Provision of Affordable Housing
MB11	Design of New Development
HB16	Housing Standards
HB18	Private Outdoor Amenity Space
HB14	Trees and Landscaping
EI2	Reducing Carbon Emissions
EI10	Water Management, Efficiency, and Quality
EI14	Air Quality
CI7	Planning Obligations and CIL
T1	Managing Transport Impacts
T2	Highways Impacts
T6	Vehicle Parking

- 7.3 Where relevant to the consideration of this proposal the relevant policies are discussed in the main body of the report.

8.0 PLANNING CONSIDERATIONS

8.1 Loss of Employment

8.1.1 The front portion of the site, comprising the former Victoria Public House, has been converted into 7 flats and is therefore already in residential use.

8.1.2 The rear portion of the site comprises 28 garages which are either vacant or used for storage while the balance of the site contains 4 commercial units formerly used as offices, but which have not been in active use for several years.

8.1.3 Although the officer's report under Planning Application Ref: 879/APP/2017/1462 indicated that some of the buildings may be in employment use, loss of employment floorspace or land was not cited as a reason for refusal, nor was it raised as an issue in the subsequent appeal with the Inspector commenting that the site lies within the Hayes Housing Zone which is expected to provide the majority of housing growth in the borough. As such it's debatable whether the portion of the site that contains the 4 small commercial units should be construed as a non designated employment site.

8.1.4 Notwithstanding this, Policy DME2 of the Hillingdon Local Plan states that proposals which involve the loss of employment floorspace or land outside designated employment areas will normally be permitted if:

i) the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or

ii) the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or

iii) sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or

iv) the new use will not adversely affect the functioning of any adjoining employment land; or

v) the proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.

8.1.5 The proposal would meet a number of these criteria for the following reasons:

- The 'employment' part of the site is very small, equating to less than 20% of the overall site area, and is landlocked by the garages to the north and the converted public house to the south. It would therefore be impractical to try and redevelop this part of the site for any meaningful employment use, particularly given the narrow width of the access and residential character of Sandow Crescent. Moreover, the site is of insufficient size, shape, or dimension to make for any meaningful redevelopment and allow service vehicles to enter and exit the site in forward gear;
- The buildings have been vacant for several years and are in poor condition such that it would not be viable to reinvest into the buildings to bring them up to lettable standard, particularly given the poor rental values that would be achieved given the sites isolated location and constrained access;
- The site is not located adjacent to any employment land such that its loss would not undermine the employment function of the wider area;
- The proposed use relates to a specific land use allocation or designation identified elsewhere in the Plan, namely the Hayes Housing Zone.

8.1.6 Given the above, the proposal would meet the exception tests of Policy DME2 and allow the site to come forward for redevelopment in accordance with the strategic objectives of the Hayes Housing Zone.

8.2 Principle of Residential Development

8.2.1 Policy GC2 of the London Plan states that to make the best use of land those involved in planning must, inter alia:

- *enable the development of brownfield land, particularly in Opportunity Areas, and sites within and on the edges of centres, as well as utilising small sites;*
- *prioritise sites which are well connected by existing or planned public transport;*
- *proactively explore the potential to intensify the use of land to support additional homes, promoting high density development on sites that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling;*
- *apply a design led approach to determine the optimum development capacity of sites;*
- *understand what is valued about existing places and use this as a catalyst for growth, renewal and place making, strengthening London's distinct and varied character;*
- *plan for good local walking, cycling and public transport connections to support a strategic target of 80% of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as utilising new and enhanced public transport links to unlock growth.*

8.2.2 Policy GC4 relates to housing delivery and states that those involved in planning must, inter alia:

- *ensure that more homes are delivered;*
- *support the delivery of the strategic target of 50% of all new homes being genuinely affordable;*
- *create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs;*
- *identify and allocate a range of sites to deliver housing locally;*
- *establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly.*

8.2.3 Policy H1 requires Hillingdon to deliver 10,830 homes over a 10-year period, equating to 1,083 per year. It goes on to say this should be achieved by encouraging development on allocated sites and on other suitable and available brownfield sites especially those with PTAL levels of 3-6 or within 800m of a station or town centre boundary.

8.2.4 Given the site is brownfield land within the Hayes Housing Zone and location within 800m of Hayes Station and town centre, the principle of housing on the site would accord with all levels of government policy.

8.3 Density

8.3.1 Policy DMHB 17 of the Council's Development Management Policies DPD relates to density and states that for suburban sites within 800m of a town centre and with a PTAL rating of 2-3, the density should be up to 110 units per hectare (u/ha) or 330 habitable rooms per hectare.

8.3.2 The site has a PTAL rating of 5 (rather than 2-3) so one would expect the density to exceed these guidelines. This is supported by the sub text of the policy which states that areas such as Uxbridge town centre and the Hayes Opportunity Area are more suited to higher density development, which in some cases may exceed these standards. In any case the policy states the Council will apply the density standards in a flexible manner, according to local circumstances, with the density ultimately determined by a design led approach.

8.3.3 The site has a gross area of 3606sqm and a net area of 3450sqm once the pedestrian and vehicle accesses onto Nestles Avenue and Sandow Crescent are deducted, while the proposal comprises 41 units (4 x studio, 7 x 1 bed, 20 x 2 bed, and 10 x 3 bed) which equates to 118 habitable rooms. The proposed density would therefore be 118u/ha or 342 hr/ha which is only marginally above the recommended guidelines for sites with PTAL scores of 2-3 and within the anticipated range for sites that fall within the Hayes Housing Zone. Moreover, for the reasons described below, the scheme would sit comfortably within its local context and make a positive contribution to the street scene and wider character and appearance of the area.

8.4 Design

8.4.1 Policy DMHB 11 of the Council's Development Management Policies states that proposals should harmonise with their local context by taking into account:

- *the 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.*

8.4.2 It goes on to say that development proposals should not adversely impact the amenity, daylight or sunlight of adjacent properties and open space.

8.4.3 North Hyde Road comprises a mix of buildings ranging from 1 to 4-storeys. The site to the west is 3-storeys while the site to the east is 2-storeys but both have pitched roofs. Further east beyond the Esso garage are a series of 4-storey blocks with recessed lift overruns at fifth floor level while beyond that at the junction of North Hyde Road and Roseville Road is a 4-storey building currently under construction. Further east, at the junction of North Hyde Road and Millington Road is the 4-storey Premier Inn development while to the north on Nestles Avenue is the Barrett Homes 'Hayes Village' development which is currently under construction with buildings ranging from 4-storeys along the street frontage rising up to 10-storeys further into the site.

8.4.4 At pre-application stage the Council indicated that a 4-storey building along the street frontage would be acceptable subject to the top floor being recessed behind the main façade and having a flat roof. A 3-storey building at the rear was also considered acceptable subject to it meeting the required separation distances to adjacent properties.

8.4.5 The proposal provides a 4-storey building with flat roof along the street frontage with the upper floor recessed behind the main facade. The height of this building would accord therefore with the 3-storey plus pitched roof block of flats to the west and the other 4-storey blocks further to the east along North Hyde Road.

8.4.6 The rear block would be 3-storeys with a partial fourth floor positioned at the southern end of the block set well back behind the main façade. This would create a transition in scale as the development moves from front to rear starting with a 4-storey building fronting the street, a 3-storey building with recessed fourth floor in the centre of the site, and a 3-storey building at the rear. The site elevation drawings demonstrate that the three-storey element at the rear would accord with the overall height of the 2-storey plus pitched roof scale of the adjacent houses to the north and east.

8.4.7 Therefore, in terms of scale, the proposals would be fully in accordance with the existing and emerging context of the surrounding area.

8.4.8 In terms of design, the buildings have been laid out and configured, internally and externally, to respond to the irregular shape of the site. The frontage block occupies most of the street frontage, save for a shared surface driveway to the east, and a landscaped pedestrian path to the west, while the rear block is L-shaped to respond to the irregular shape and dimension of this part of the site. Separation distances of 21m have been achieved between the front and rear blocks and also to the houses to the north and east.

8.4.9 At pre-application stage it was agreed that if the owners of the medical centre site did not want to be included in the scheme, then a separation distance of circa 7m should be achieved to the boundary of that site to enable it to be redeveloped in the future. The owners were approached but did not respond to enquiries so the 7m setback distance has been achieved and the Design & Access Statement also demonstrates options for how that site could be redeveloped in the future alongside the proposed scheme.

8.4.10 The external appearance of the building is of a brick clad façade to shoulder height with the recessed upper floors clad in a more light-weight material to reflect the colour and material of the windows and doors below. The fenestration pattern is one of full height windows and doors punched through the façade to give a

lightness to the elevations and maximise sunlight/daylight into the units. Projecting balconies with metal railings are proposed on the middle floors with the ground floor units having private gardens and the upper floor apartments benefitting from recessed terraces. The exposed roof areas would be covered in a green sedum roof inter-dispersed with PV panels to the front and rear block to maximise the environmental performance and sustainability of the development.

- 8.4.11 The layout, scale, mass, and design of the proposal is therefore considered to sit comfortably in its local context while making the best and most efficient use of this highly accessible brownfield site within the Hayes Housing Zone.

8.5 Affordable Housing

- 8.5.1 Policy DMH 7 of the Council's Development Management Policies DPD requires developments of 10 or more units to provide a minimum of 35% of the units as affordable housing, split 70% social/affordable rent and 30% intermediate, subject to viability.
- 8.5.2 A financial viability appraisal has been submitted with the application by Kempton Carr Croft which shows the scheme is not able to deliver any affordable housing and the likely S106 and CIL contributions and remain viable. No affordable housing is therefore proposed.

8.6 Housing Mix

- 8.6.1 Policy DMH 2 of the Council's Development Management Policies DPD states that a mix of unit sizes will be required in redevelopment schemes. The subtext of the policy notes that there is a borough wide requirement for larger properties, particularly 3 or more bedrooms.
- 8.6.2 The proposal provides 4 x studio, 7 x 1 bed, 20 x 2 bed, and 10 x 3 bed flats which provides an excellent mix of unit sizes across the scheme. It would also provide 33% of the units (calculated by habitable room) as 3-bed family units which would help address the borough wide requirement for this size of properties.

8.7 Internal Space Standards

- 8.7.1. Policy DMHB 16 of the Council's Development Management Policies DPD states that all housing should meet the following internal minimum spaces standards, and in the case of major developments (of 10 or more units), at least 10% of the new housing should be accessible or easily adaptable for wheelchair users.

1b1p – 37sqm
 1b2p – 50sqm
 2b3p – 61sqm
 2b4p – 70sqm
 3b4p – 74sqm
 3b5p – 86sqm
 3b6p – 95sqm

- 8.7.2 All of the units would meet or exceed the minimum space standards while 10% of the units will be accessible or easily adaptable for wheelchair users.

8.8 Amenity Space

- 8.8.1 Policy DMHB 18 of the Council's Development Management Policies DPD states that all new flats should have the following minimum amenity space provision (based on a combination of private and communal space):

1 bed – 20sqm
 2 bed – 25sqm
 3 bed – 30sqm

- 8.8.2 It goes on to say where balconies are proposed these should have a minimum depth of 1.5m and a minimum width of 2.0m and for ground floor flat that are non-street facing they should have a defensible space of 3m or more in front of any habitable room window.

8.8.3 The subtext of the policy goes on to say that ground floor flats should have private gardens while upper floor flats should have balconies or terraces where this is consistent with the design of the building. Moreover, as the Council is keen to improve the quality of housing, the use of communal private amenity space in isolation is generally not encouraged.

8.8.4 Based on the unit mix of 4 x studios, 7 x 1 bed, 20 x 2 bed and 10 x 3 bed, a total of 1020sqm of private and communal amenity space should be provided on-site.

8.8.5 The proposal provides 1954sqm broken down as follows:

Private gardens, balconies, or terraces:	621sqm
Communal Amenity Space (ground level):	1214sqm
Communal Roof Garden (Block B):	119sqm
Total Amenity Space Provision	1954sqm

8.8.6 All of the ground floor flats would also be provided with private gardens ranging between 18 and 62sqm and of at least 3m depth (including the perimeter hedge). The flats on the middle floors would all have projecting balconies ranging from 6 to 9sqm depending on the size of the unit while the top floor flats would have terraces ranging from 16 to 20sqm. All balconies and terraces would have a minimum width of 2.0m and depth of 1.5m to meet the minimum requirements.

8.8.7 The proposal therefore comfortably exceeds the minimum amenity space requirements.

8.9 Access and Parking

8.9.1 Policy T6 of the London Plan states that car-free development should be the starting point for all developments that are (or are planned to be) well-connected to public transport. Policy T6.1 goes on to say that all sites with PTAL ratings of 5-6 should be car free, save for disabled parking which is required for up to 10% of the number of units.

8.9.2 The proposal is 'car free' in accordance with this policy, save for the provision of 5 disabled parking spaces to meet the minimum requirement.

8.9.3 A Transport Statement has been submitted with the application by I-Transport which considers the level of traffic generation to and from the site relative to the existing use and concludes there will be an overall reduction in trip generation. It also demonstrates that all cars and service vehicles, including refuse vehicles, will be able to enter and exit the site in forward gear and be able to stand on the shared surface driveway without impeding access for other vehicles. The report also describes how the existing traffic island in the centre of North Hyde Road can be repositioned, secure by legal agreement, to improve pedestrian safety and access into the site.

8.10 Cycle Parking

8.10.1 Policy T5 of the London Plan requires the following minimum cycle parking:

Studio or Bedsits:	1.0 space per unit
1 Bed Flats:	1.5 spaces per unit
2 + Bed Flats:	2.0 space per unit

8.10.2 In addition to the above a further 2 short stay spaces are required for the first 40 units and a further space for every 40 units thereafter.

8.10.3 Based on the proposed mix of 4 x studio, 7 x 1 bed, 20 x 2 bed, and 10 x 3 bed the scheme would generate a requirement for 75 long stay spaces and 3 short stay spaces.

8.10.4 These spaces would be provided throughout the site in enclosures along the northern and eastern boundaries and within the centre of the site. There would also be scope for some of the ground floor units to accommodate cycle parking within their private gardens.

8.11 Sunlight and Daylight

- 8.11.1 Policy DMHB11 of the Council's Local Plan states that the Council will aim to minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing caused by new development on habitable rooms, amenity space and public open space. The Council will also seek to ensure that the design of new development optimises the levels of daylight and sunlight. It goes on to say the Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) "Site layout planning for daylight and sunlight: A guide to good practice".
- 8.11.2 A Daylight and Sunlight Assessment has been submitted with the application by Right of Light Consulting and the reports concludes the development will have a relatively low impact on the light received by neighbouring properties such that it would be acceptable in sunlight and daylight terms.

8.12 Privacy and Overlooking

- 8.12.1 Policy DMHB11 of the Council's Local Plan states that the Council will aim to ensure that there is sufficient privacy for residents and will resist proposals where there is an unreasonable level of overlooking between habitable rooms and private open spaces. A minimum separation distance of 21 metres is required between windows of habitable rooms to maintain privacy and prevent overlooking.
- 8.12.2 The proposal has been carefully designed to ensure these requirements are met both internally within the site and to adjacent properties.
- 8.12.3 Page 21 of the Design & Access Statement demonstrates that separation distances of 21m have been achieved internally between the front and rear block and externally to the houses to the north and east. A separation distance well in excess of 21m has also been achieved to the medical centre building to the west and it's also been demonstrated how this site could be redeveloped in the future to achieve separation distances of either 21m to a facing habitable room window or 15m to a flank wall without unreasonably compromising the development potential of the site.
- 8.12.4 It should also be noted that with respect to the maisonettes to the north and east, the rear gardens of these properties have been subdivided such that the ground floor flat has access to the garden closest to the building while the upper floor flat has access to the rear part of the garden. The consequence of this is the rear part of the gardens closest to the application site are less intensively used and are already overlooked from the upper floor flats of the adjacent maisonettes. Therefore, although some overlooking of these spaces will occur this is not uncommon given the surrounding pattern of development.

8.13 Trees and Landscaping

- 8.13.1 Policy DMHB 14 relates to trees and landscaping and states that all proposals will be expected to retain or enhance existing landscaping, trees, biodiversity, and other natural features of merit.
- 8.13.2 A Tree Survey, Arboricultural Impact Assessment and Arboricultural Method Statement has been submitted with the application by Challice Consulting. The report notes there 18 individual trees or groups of trees on or immediately adjoining the site. Of these, none are classified as high-quality category 'A' trees; 5 are classified as moderate quality category 'B' trees; 12 as low-quality category 'C' trees and 1 is a poor-quality category 'U' tree recommended for immediate removal.
- 8.13.3 Of the 18 individual or group of trees, 8 are proposed to be removed, being trees T2, G3, T4, T5, T9, T10, G15 and G17, all classified as either poor-quality Category 'C' trees or the trees marked for immediate removal. The remaining 10 trees would all be retained, including the 5 highest quality Category 'B' trees being T1, T8, T11, T12 and T18.
- 8.14.4 New landscaping would also be provided throughout the site including new tree planting along the street frontage and side and rear boundaries. The indicative landscaping proposals are shown within the Design and Access Statement, but further details will be provided by way of condition.

8.14 Urban Greening

- 8.14.1 Policy G5 of the London Plan relates to urban greening and 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, including by incorporating measures such as high-quality landscaping, green roofs, green walls, and nature-based sustainable drainage. It goes on to say that boroughs should develop an Urban Greening Factor (UGF) score to identify the appropriate amount of urban greening but where this hasn't occurred, as an interim measure, the Mayor recommends a target score of 0.4 for developments that are predominately residential.
- 8.14.2 An Urban Greening scorecard has been submitted with the application that demonstrates the scheme achieves a score of 0.4 in accordance with Policy G5 due to the removal of the existing buildings and hardstanding and replacement with new buildings with green roofs and extensive areas of landscaping.

8.15 Sustainable Urban Drainage

- 8.15.1 Policy SI13 of The London Plan requires development proposals to aim to achieve greenfield run off rates and ensure surface water is managed as close to its source as possible.
- 8.15.2 A Sustainable Urban Drainage Strategy has been submitted with the application by Ardent Consulting. The report demonstrates that surface water run-off from the site will be managed in several ways including infiltration via green roofs and permeable surfaces as well as an underground storage tank under the driveway to reduce run-off rates by 98% beyond the existing situation.

8.16 Renewable Energy

- 8.16.1 Policy SI2 of The London Plan requires all major development proposals to be net carbon zero by reducing greenhouse gas emissions in accordance with the following hierarchy:
- 1) be lean: use less energy and manage demand during operation
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) be seen: monitor, verify and report on energy performance
- 8.16.2 An Energy and Sustainability Statement has been submitted with the application by Maven Sustainability.
- 8.16.3 The report describes how the proposed development will be kept 'lean' and 'clean' through a range of energy efficient measures including enhanced building insulation and air tightness to achieve a circa 20% reduction in carbon emissions below the standard building regulation requirement. To meet the 'green' requirement the proposal would include a communal space and hot water heating network using air source heat pumps mounted on the roof of each building while 59 photovoltaic panels would be provided on the roof of both blocks to achieve a further 51% reduction in carbon emissions below the standard building regulation requirement. The development will then be made 'carbon neutral' by way of a carbon offset payment of £32,544, secured by way of a legal agreement.

8.17 Noise

- 8.17.1 Policy D14 of The London Plan relates to noise and requires new developments to be designed and where appropriate mitigated to ensure good quality living conditions for future occupiers.
- 8.17.2 A Noise Assessment has been submitted with the application by Hawkins Environmental. The report demonstrates that although the site experiences elevated noise levels due to its proximity to the road and other noises sources, these impacts can be satisfactorily mitigated with the glazing and ventilation measures set out in the report. Subject to these measures being adhered to the report concludes a good internal and external living environment can be achieved.

8.18 Air Quality

- 8.18.1 Policy SI1 of The London Plan requires all major developments to submit an Air Quality Assessment to demonstrate the proposal provides good quality living conditions for future occupiers while also ensuring it doesn't contribute to an unacceptable worsening of air quality levels in the wider area.
- 8.18.2 An Air Quality Assessment has been submitted with the application by Hawkins Environmental. The report notes that at present and in the opening year of the development (2024), concentrations of all air pollutants are below the relevant air quality objectives. It goes on to say that considering the emissions likely to arise from the traffic movements to and from the site and any emissions from the proposed buildings the development can be considered 'air quality neutral'. With regard to demolition and construction impacts on air quality, dust and other emissions, the site is considered a medium risk site however with appropriate mitigation, controlled by way of condition, these impacts will not be significant. As such the report concludes that the proposal would meet all relevant local and national policy guidance in respect of air pollution.

8.19 Fire Safety

- 8.19.1 Policy D12 of The London Plan requires the submission of a Fire Statement with all major planning applications to demonstrate how fire safety measures have been incorporated into the design.
- 8.19.2 A Fire Statement has been submitted with the application by BB Seven.
- 8.19.3 The report provides an overview of the relevant fire safety legislation before describing the mitigation measures incorporated into the design. These include such things as fire resistant building materials and sprinkler systems, means of escape strategies, and access for fire-fighting personal.
- 8.19.4 The report concludes the building has been appropriately designed with respect to fire safety and that further information will be provided as a condition of consent and/or at building regulations stage to ensure all other relevant fire safety matters are addressed.

8.20 Planning Obligations and Community Infrastructure Levy

- 8.20.1 Policy DMCI7 of the Council's Local Plan states that infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL) and planning obligations which will be sought on a scheme-by-scheme basis to secure affordable housing, meet other infrastructure requirements not addressed through CIL, and ensure development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.
- 8.20.2 The Council's Community Infrastructure Levy is currently £133.88 per additional sqm of floorspace over and above the existing. This CIL contribution is therefore likely to be:

Proposed gross internal area (3389sqm) – existing gross internal area (1174sqm) = 2215sqm x £133.88 = £307,619.20.

- 8.20.3 The Mayor's Community Infrastructure Levy is also applicable to the scheme and is calculated at a rate of £60.55 per sqm for all new floorspace over and above the existing, subject to indexation and inflation. The Mayoral CIL contribution is therefore likely to be:

Proposed gross internal area 3389(sqm) – existing gross internal area (1174sqm) = 2215sqm x £60.55 = £134,118.25.

- 8.20.4 The total CIL figure is therefore likely to be £307,619.20. + £134,118.25 = £441,737.45 plus any applicable indexation and inflation.

9.0 CONCLUSION

- 9.1 Planning permission is sought for demolition of the existing buildings and erection of two blocks of 41 flats (4 x studio, 7 x 1 bed, 20 x 2 bed, and 10 x 3 bed) with 5 disabled parking spaces and vehicular access off North Hyde Road.
- 9.2 The proposal follows on from earlier pre-application discussions that have refined the layout, scale, mass, and number of parking spaces on the site. The reduction in parking spaces has freed up a considerable amount of space on the site and allowed the buildings to sit more comfortably in their context with the green space in between providing excellent amenity for future occupiers.
- 9.3 Although part of the site was formerly in employment use this ceased several years ago, and it has been demonstrated it would be impractical and indeed contrary to the over-riding housing designation and character and appearance of the surrounding area for this part of the site to be redeveloped for employment purposes.
- 9.4 The principle of residential development is however supported by all levels of government policy given the sites highly accessible location and position within the Hayes Housing Zone.
- 9.5 The density of the scheme, at 118u/ha and 342hr/ha, would be within the density range expected for such a highly accessible site while the scale and mass would be consistent with the surrounding context, comprising a taller 4-storey building at the front reducing to 3-storeys at the rear as the buildings transition in scale through the site.
- 9.6 The buildings have also been positioned to meet the required 21m separation distance between the two blocks and the properties to the north and east while it's been demonstrated that the proposal would not prejudice the redevelopment potential of the medical centre site to the west, who were approached but declined to become a part of the scheme.
- 9.7 The 5 parking spaces would accord with the minimum requirements of the London Plan and reflect the sites highly accessible location close to the railway station, bus stops and town centre. However, the proposed disabled parking, electrical vehicle charging points, and cycle parking spaces would all meet or exceed the minimum requirements. The opening up of the pedestrian walkway along the western boundary of the site would also improve accessibility to the station and town centre, representing a key public benefit of the scheme.
- 9.8 Although no affordable housing can be viably delivered on the site, the scheme would still deliver CIL and Planning Obligations amounting to £441,737 to contribute towards local services and infrastructure improvements.
- 9.9 A variety of other technical reports have also been submitted with the application to meet all the relevant policy requirements in respect of renewable energy, sunlight/daylight, sustainable urban drainage, noise, air quality, urban greening, and trees.
- 9.10 The proposal will make the best and most efficient use of this brownfield site close to public transport and local shops and services and it is therefore respectfully requested that planning permission be granted subject to a legal agreement and appropriate conditions.