



Planning Statement


December 2022 // Haydon House, 296 Joel Street, HA5 2PY



Haydon House, 296 Joel Street, HA5 2PY

Client: Westgold Holdings Ltd

Our Ref: JLD/mac/9511

| Prepared by | Checked by | Date | Signature |
|---------------|------------|---------------|--|
| Josh Daruvala | Nick Davey | November 2022 |  |

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1. INTRODUCTION

- 1.1 This Statement supports an application that seeks full planning permission to redevelop Haydon House and replace it with a four-storey block of 13 flats. Haydon House is a two-storey office block situated at 296 Joel Street in Pinner. It has been vacant since December 2021.

Planning History

- 1.2 On the 14th of June 2022, the Applicant made a prior approval submission (ref: 51321/APP/2022/1861), under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), for a change of use from Class E (Offices) to Class C3 (6 no. self-contained flats). The application was approved on the 2nd of November 2022.
- 1.3 There is no other planning history available for the site on the Council's web-site.

2. THE APPLICATION SITE

- 2.1 The building is located on the western side of Joel Street, in close proximity to its intersections with Deerlings Drive, Kaduna Close and High Road Eastcote. The main access, and principal elevation, front onto Joel Street, with vehicle parking to the rear. The site is bounded on the three remaining sides by residential properties; 290 Joel Street to the north and numbers 26-31 Deerlings Drive to the south and west.
- 2.2 Whilst the site's PTAL Rating is 1b, there are a number of bus services within walking distance. Services and facilities, including two public houses, a childrens indoor play centre, Eastcotes Cricket and Tennis clubs and the local parade on High Road Eastcotes that comprises a convenience store, hairdressers and three hot food takeaways, are situated close by.

Heritage Assets

- 2.3 The building is not listed and there are no listed buildings in close proximity. It lies just outside the boundary of the Eastcote Village Conservation Area.

Flood Risk

- 2.4 Haydon house is situated within Flood Zones 2/3.

3. THE PROPOSAL

- 3.1 Although permission exists (ref: 51321/APP/2022/1861) to convert the building into 6 flats, the Applicant does not consider that this makes the optimum use of the site. It thus seeks planning permission to demolish the office block and replace it with a three-storey building, with accommodation in the roof, to provide 13 flats, with associated amenity space, bin storage, cycle storage and vehicle parking. This represents an increase of 7 units to that granted under the prior approval process.
- 3.2 The proposal, which is described in the Design & Access Statement, is supported by the following drawings and documents:
- Drawing 166-3GA-01 – Proposed Site Plan.
 - Drawing 166-3GA-02 – Proposed Ground and First Floor Plan.
 - Drawing 166-3GA-03 – Proposed Second & Third Floor Plan.
 - Drawing 166-3GA-04 – Proposed Roof Plan.
 - Drawing 166-3GA-05 – Proposed Elevations.
 - Drawing 166-3GA-06 – Proposed Elevations.
 - Drawing 166-3GA-07 – Proposed Sections.

- Drawing 2022-1000-1 – Landscape Proposals.
- Drawing 2022-3000-1 – Planting Plan.
- Air Quality Assessment.
- Daylight & Sunlight Assessment.
- Design & Access Statement.
- Fire Strategy.
- Flood Risk Assessment.
- Noise Impact Assessment.
- Planning Statement.
- Preliminary Ecological Appraisal.
- Sustainability & Energy Statement.
- Transport Statement.
- Viability Assessment.

4. PLANNING POLICY

4.1 Paragraph 2 of the National Planning Policy Framework (NPPF) confirms that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise. Paragraphs 10 and 11 provide that a presumption in favour of sustainable development should be applied to planning decisions. This means: -

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no development plan policies, or the policies which are most important for determining the application are out of date, granting planning permission unless: -*
 - i. the application or policies in this framework protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or*
 - ii. any adverse impact in doing so will significantly and demonstrably outweigh the benefits when assessed against the policies in this framework taken as a whole.*

4.2 The principal development plan documents for Hillingdon include: -

- The London Plan 2021.
- Local Plan: Part 1 Strategic Policies adopted November 2012.
- Local Plan: Part 2 Development Management Policies adopted January 2020.

4.3 The Local Plan Proposals Map shows the site to lie, without notation, within defined settlements.

4.4 Relevant policies are as follows:

London Plan

- Policy GG1: Building strong and inclusive communities.
- Policy GG2: Making the best use of land.
- Policy GG3: Creating a healthy city.
- Policy GG4: Delivering the homes Londoners need.
- Policy GG6: Increasing efficiency and resilience.
- Policy D3: Optimising site capacity through the design-led approach.
- Policy D4: Delivering good design.
- Policy D6: Housing quality standards.
- Policy D7 Accessible housing.
- Policy D12 Fire Safety.
- Policy: Agent of Change.
- Policy D14: Noise.
- Policy H2: Small Sites.
- Policy H4: Delivering affordable housing.
- Policy H5: Threshold approach to applications.
- Policy H10: Housing mix.
- Policy HC1: Heritage conservayion and growth.
- Policy G5: Urban greening.
- Policy G6: Biodiversity and access to nature.
- Policy G7: Trees and woodlands.
- Policy SI1 Improving air quality.
- Policy SI2 Minimising greenhouse gas emissions.
- Policy SI4: Managing heat risk.
- Policy SI6: Digital connectivity infrastructure.
- Policy SI12: Floof risk management.
- Policy SI13: Sustainable drainage.

- Policy T1: Strategic approach to transport.
- Policy T2: Healthy Streets.
- Policy T4: Assessing and mitigating transport impacts.
- Policy T5: Cycling.
- Policy T6: Car parking.
- Policy T6.1: Residential parking.
- Policy T7: Deliveries, servicing and construction.

Local Plan – Part 1 Strategic Policies

- Policy NPPF1: National Planning Policy Framework – Presumption in Favour of Sustainable Development.
- Policy H1: Housing Growth.
- Policy H2: Affordable Housing.
- Policy HE1: Heritage.
- Policy BE1: Built Environment.
- Policy EM1: Climate Change, Adaption and Mitigation.
- Policy EM6: Flood Risk Management.
- Policy EM7: Biodiversity and Geological Conservation.
- Policy EM8: Land, Water, Air and Noise.
- Policy EM11: Sustainable Waste Management.
- Policy T1 – Accessible Local Destinations.

Local Plan – Part 2 Development Management Policies

- Policy DMH2: Housing Mix.
- Policy DMH7: Affordable Housing.
- Policy DMHB1: Heritage Assets.
- Policy DMHB4: Conservation Areas.
- Policy DMHB11: Design of New Development.
- Policy DMHB14: Trees and Landscaping.

- Policy DMHB15: Planning for Safer Places.
- Policy DMHB16: Housing Standards.
- Policy DMHB17: Residential Density.
- Policy DMHB18: Private outdoor space.
- Policy DMHB19: Play Space.
- Policy DMEI2: Reducing Carbon Emissions.
- Policy DMEI7: Biodiversity Protection and Enhancement.
- Policy DMEI9: Management of Flood Risk.
- Policy DMEI14: Air Quality.
- Policy DMT1: Managing Transport Impact.
- Policy DMT2: Highways Impact.
- Policy DMT5 Pedestrians and Cyclists.
- Policy DMT6: Vehicle Parking

5. PRINCIPLE (London Plan Policies GG2, GG4, D3, H2 and T1 and Local Plan Policies H1, T1 & DMT1)

- 5.1 London Plan Policy GG4 seeks to, “.... ensure that more homes are delivered”, whilst Local Policy H1 provides that the Council will seek to meet and exceed its housing growth targets, with Policy T1 steering development to the most appropriate locations in order to reduce their impact on the transport network and encourage access by sustainable modes including cycling and walking.
- 5.2 London Plan Policies GG2, D3 and T1 seek to make the best use of existing developed sites, whilst Policy H2 recognises that, if London is to deliver the housing it needs, small sites must make a substantially greater contribution. It thus seeks to significantly increase the number of new homes delivered by small sites.
- 5.2 The Council’s ‘Five Year Supply of Deliverable Housing (Sites March 2022)’ document, provides that an annual average of 1050 new dwellings need to be completed in order to achieve it’s 5-year housing land supply target. Whilst the Council can currently demonstrate that it has a 5-year supply of housing land, a large percentage (28%) is made up of windfall sites. In order for the Borough to maintain its strong housing land supply position, windfall sites such as this have to continue to come forward.
- 5.3 The site lies within an established residential area and is a previously developed site that already has consent for residential use. Its public transport links are reasonable and there are a good range of services and local facilities within an easy cycle or walk. The redevelopment of this small site for residential purposes is, in principle, acceptable and accords with all relevant development plan policies.

6. DENSITY & HOUSING MIX (London Plan Policies D3 and H2 and Local Plan Policies DMHB2 and DMHB17)

- 6.1 Local Plan Policy DMHB17 provides that all new residential development should take account of the Residential Density Matrix, with flatted developments, in non-town centre locations, expected to achieve a density of 35-100. The more up-to-date London Plan Policy D3 provides that all developments must make the best use of land and encourages, in areas such as this, incremental densification (particularly through the development of small sites).
- 6.2 The site measures approximately 750sqm (0.075ha) and the proposal will thus have a density of some 212 units per ha. The supporting text provides that the standards, which are designed to make sure that new development provides an appropriate level of amenity for its residents, whilst also being compatible with the character of the locality, will be applied with a degree of flexibility. The Design & Access Statement describes how the building had been carefully designed with site constraints in mind and so as to sit comfortably on the site.
- 6.3 London Plan Policy H10 provides that schemes should generally consist of a range of unit sizes, with Local Plan Policy DMHB2 providing that the Council will require a mix of housing units that reflect the latest information on housing need.
- 6.4 The Hillingdon Strategic Housing Market Assessment 2018 indicates a substantial borough-wide requirement for larger affordable and private market units and, in particular, three-bedroom properties. The scheme does not include proposals for any 3-bedroom units, but it does provide 6no. 2-bed and 7 no. 1-bed units, for which there is still a sizeable demand. As permission exists to convert the existing building into 6, 1 and 2-bed, flats, there is no conflict with these policies.

7. AFFORDABLE HOUSING (London Plan Policies H4 and H5 and Local Plan Policies H2, DMH7)

- 7.1 London Plan Policies H4 and H5 and Policies H2 and DMH7 of the Local Plan provide that, “..... *subject to viability and if appropriate in all circumstances, a minimum 35% of all new homes on sites of 10 or more units should be delivered as affordable housing*”. The scheme will provide a total of 13 no. new residential units and, subject to viability, should provide 4 (rounded down) affordable units.
- 7.2 A viability survey has been undertaken by Hyde Park Construction Ltd. It looks in detail at land values and demolition and construction costs as well as residential values in the area and other key considerations such as the policy position, to establish whether the provision of affordable housing as part of this scheme is achievable.
- 7.3 It concludes that, on an open market development basis, there is a viability deficit and that no surplus is generated to support any affordable housing contribution (or any other s106 costs). Accordingly, no affordable housing contribution is proposed.
- 7.4 As the viability assessment has demonstrated that the scheme cannot deliver any affordable housing, there is no conflict with affordable housing policies.

8. DESIGN & LAYOUT (London Plan Policies GG1, D4, HC1 and G7 Local Plan Policies HE1 BE1, DMHB1 DMHB4, DMHB11 and DMHB14)

- 8.1 London Plan Policies GG1 and D4, together with Local Plan Policies BE1 and DMHB11, require that all new development achieves a high quality of design and maintains or improves the quality of the built environment. The Design and Access Statement includes a local character appraisal and contextual analysis and describes how the proposal responds to the host site and its surrounding context and how they have influenced the scale, height and massing of the building and the layout of the site. It describes how the design was developed and articulated and how the detailed

elevations and materials were informed by the character appraisal to deliver a building that is off good architectural composition and harmonises with local context.

Trees

- 8.2 London Plan Policy G7 and Local Plan Policy DMHB 14 seek to ensure that all new development retains or enhances existing landscaping, trees and other natural features of merit and provides a good landscape scheme. Landscape and Planting Drawings 2022-1000 detail planting proposals to mitigate the loss of existing trees.

Conservation Area

- 8.3 London Plan Policy HC1 and Local Plan Policies HE1, DMHB1 and DMHB4 seek to ensure that new development respects the historic environment. The boundary of the Eastcote Village Conservation Area lies on the opposite side of Joel Street, with Policy DMHB4 providing that development on its fringes should preserve or enhance its character and appearance. Whilst the proposed building moves a couple of metres closer to the site frontage, and is a little taller than the building that it replaces, it does not change the fundamental relationship that the site has with the Conservation Area or its setting. The proposal will not harm, or in anyway impact, the character and appearance of the heritage asset.

Impact on Neighbours

- 8.4 Local Plan Policy DMHB11 provides that development proposals should not adversely impact on the daylight and sunlight enjoyed by adjacent properties and open space. The application is accompanied by a Daylight and Sunlight Assessment that identifies four adjacent properties as sensitive receptors (these being 292 Joel Street and 29, 30 & 31 Deerings Drive). The report concludes as follows:

..... the development proposals have been appraised in line with the guidelines set out in the BRE document. When assessed against the criteria for establishing whether the proposed development will have a significant impact, it has been possible to conclude the development will not result in a notable reduction in the amount of either daylight or sunlight enjoyed by the neighbouring buildings..

Overlooking & Loss of Privacy

- 8.5 Policy DMHB11 also provides that new development should not adversely impact the general amenity of neighbours. The Design & Access Statement describes how the building has been designed to avoid direct overlooking of windows, and loss of privacy, to, adjacent dwellings.

9. RESIDENTIAL AMENITY (London Plan Policies D6, D7, D13 and D14 and Local Plan Policies EM8, DHMB15, DHMB16, DHMB18 and DHMB19)

Housing Standards

- 9.1 London Plan Policy D6 and Local Plan Policy DMHB16 require that all residential units meet or exceed internal space standards (Table 3.1 of the London Plan and Table 5.1 of the Local Plan: Part 2). Figure 2 (overleaf) demonstrates that this requirement has been met (NB: the studio flats have shower rooms and, therefore, the standard required is 37sqm).
- 9.2 London Plan Policy D7 and Local Plan Policy DHMB16 require that 10% of the units be wheelchair accessible or easily adaptable to accommodate wheelchair users. The Design & Access Statement confirms all the flats are wheelchair accessible with one unit being fully compliant with Building Regulation M4(3) (Wheelchair User Dwellings) criteria

| Project Address: | | Haydon House, 296 Joel Street, HAS 2PY | | | | | | | |
|--------------------|---------------|--|---------------|------|------|------|------|--------|-------|
| Project No. : | | 166 | | | | | | | |
| Client: | | HP Construction | | | | | | | |
| | | | | | | | | | |
| RESIDENTIAL | | | | | | | | | |
| LEVEL | | | UNIT TYPOLOGY | | | | | | AREA |
| | | | 1B2P | 2B3P | 2B4P | 3B4P | 3B5P | STUDIO | sqm |
| 0 | F01 | | | | 1 | | | | 88.6 |
| | F02 | | | | 1 | | | | 85.3 |
| | Partial total | | 0 | 0 | 2 | 0 | 0 | 0 | 173.9 |
| | | | | | | | | | |
| 1 | F03 | | 1 | | | | | | 50.5 |
| | F04 | | | | | | | 1 | 38.4 |
| | F05 | | | 1 | | | | | 73.9 |
| | F06 | | 1 | | | | | | 52.7 |
| | Partial total | | 2 | 1 | 0 | 0 | 0 | 1 | 215.5 |
| | | | | | | | | | |
| 2 | F07 | | 1 | | | | | | 50.5 |
| | F08 | | | | | | | 1 | 38.4 |
| | F09 | | | | 1 | | | | 75.8 |
| | F10 | | 1 | | | | | | 52.7 |
| | Partial total | | 2 | 0 | 1 | 0 | 0 | 1 | 217.4 |
| | | | | | | | | | |
| 3 | F11 | | 1 | | | | | | 58.2 |
| | F12 | | | | 1 | | | | 81.6 |
| | F13 | | | 1 | | | | | 69.4 |
| | Partial total | | 1 | 1 | 1 | 0 | 0 | 0 | 209.2 |
| total per typology | | | 5 | 2 | 4 | 0 | 0 | 2 | |
| TOTAL | | | 13 | | | | | | 816 |

Figure 2: Units Sizes (GIA).

Outdoor Amenity Space

- 9.3 London Plan Policy D6 and Part A) of Local Policy DMHB18 state that all new residential development should provide good quality and usable private outdoor amenity space in accordance with relevant standards. For flats, this would be in the form of private communal amenity space and/or balconies/terraces
- 9.4 London Plan Policy D6 provides that new dwellings should have a minimum of 5 sqm of private outdoor amenity space. Local Plan Policy DHMB16 provides that studio and 1-bed flats should have a minimum of 20sqm of private amenity space and 2-bed flats, 25sqm. It states that, where provided, balconies should have a minimum depth of 1.5m and a width of not less than 2m (equating to a minimum size of 3sqm).
- 9.5 Whilst no communal amenity space is provided as part of the scheme, each flat has a private balcony, or in the case of a ground floor flat, a private terrace, which significantly exceeds the minimum size standard for a balcony. Private amenity space is of greater amenity value to a dwelling and is more usable than communal space. Accordingly, and whilst the scheme does not comply with the wording of the Local Plan (although it does comply with the London Plan), it will deliver a good quality environment and level of amenity for each resident.
- 9.6 Local Plan Policy DHMB16 also provides that any ground floor unit that is non-street facing should have a defensible space of not less than three metres in depth in front of any window to a bedroom or habitable room. This standard is achieved in respect of the majority of ground floor windows.

- 9.7 Local Plan Policy DHMB16 requires that the design, materials and height of any front boundary treatment must be in keeping with the character of the area. The existing front boundary wall is to be retained unaltered.

Play Space.

- 9.8 Local Plan Policy DMHB19 states that new major residential development, which results in an occupancy of 10 or more children, will be required to provide children and young people's play facilities on site. The proposed development will provide 13, one and two-bedroom, flats and is, therefore, highly unlikely too result in this number of children living on site at any one time.

Safety & Security

- 9.9 The Design and Access Statement describes how the scheme takes on board Secure by Design principles and will provide, consistent with Local Plan Policy DMHB15, a safe and inclusive environment.

Daylight & Sunlight

- 9.10 Consistent with London Plan Policy D6, the majority of dwellings and some habitable rooms are dual aspect. A Daylight & Sunlight Report also concludes that:

..... for all rooms, the provision of natural daylight will meet or exceed the minimum required threshold set out in the BRE guidelines. Consequently, it can be concluded that these habitable spaces will be well lit and will have a reduced reliance on supplementary electric lighting

It has also been possible to demonstrate that in each of the proposed units, the main living area will receive at least 1.5 hours of direct sunlight. As a consequence of the light and additional visual interest provided by this direct sunlight, the amenity value of these rooms will be enhanced.

Noise

- 9.11 London Plan Policies D13 and D14 and Local Plan Policy EM8 provide that noise sensitive development will only be permitted where noise impacts are adequately controlled. The application includes a Noise Report that concludes that, subject to the installation of a robust glazing specification, internal noise levels for all the flats will be commensurate with best practice design guidance. No further mitigation measures are recommended or proposed.

10. Transport and Parking (London Plan Policies T2, T4, T5, T6 and T6.1 and Local Plan Policies EM11, DMT1, DMT2, DMT5 and DMT6)

- 10.1 London Plan Policies T2 and T4, together with Local Plan Policies DMT1 and DMT2, seek to ensure that all new development is provided with a safe and convenient vehicle access and has no adverse impacts on the local highway network.
- 10.2 The application is accompanied by a Transport Statement that confirms that the existing access arrangements will be retained and are capable of supporting the proposed development. It concludes that the site is situated in a sustainable location and that most journeys will be made on foot or via the readily available public transport in the area. The development will ultimately reduce overall trip generation (when compared to continued office use) to and from the site, whilst also increasing the number of pedestrian trips.

Servicing

- 10.3 London Plan Policy T7 and Local Plan Policies EM11 and DMT1 require that new development is provided with appropriate delivery, servicing, drop off and waste storage arrangements, which are further described in the Design & Access and Transport Statements.

Car Parking

- 10.4 London Plan Policies T6 and T6.1 provide that car-free development should be the starting point for all development proposals in accessible locations and that an absence of local on-street controls should not be a barrier to new development. Local Policy DMT6 states that development proposals must comply with parking standards set out in the plan unless:
- the variance would not lead to a powerful impact on street parking provision combat congestion or local community; and/or
 - a transport appraisal and travel plan has been approved and parking provision is accordance with its recommendations.
- 10.5 The development provides a mix of 1 and 2-bed flats and, in accordance with the standards, requires a maximum of 1 to 1.5 spaces per flat and 1 space for each of the two studio flats. This equates to a maximum total of between 13 and 18.5 spaces. London Plan Policy T6.1 states that new development in outer London PTAL 0-1 area should provide a maximum of 0.75 spaces per dwelling, which equates to 9.75 spaces
- 10.6 The development has 8 spaces and maximum London and Local Plan standards will not, therefore, be breached.
- 10.7 The Transport Statement concludes that, based upon the site's good accessibility, car ownership rates in the local area, method of travel to work data and recent changes in behavioural patterns and the increase in home working following the COVID-19 pandemic, the level of parking provision is appropriate and will not create on-street parking pressures. It also demonstrates that the parking is appropriately designed and laid out and incorporates one disabled parking bay.
- 10.8 The Design & Access Statement confirms that 20% of the spaces will be provided with 'active' electric charging provision and the remainder with 'passive' provision. It also confirms that a 'club vehicle' will be provided.

Pedestrians and Cyclists

- 10.9 London Plan Policy D5 and Local Plan Policies DMT1 and DMT5 state that new development should provide safe, direct and inclusive access for pedestrians and cyclists and cycle parking provision in accordance with local plan standards. Existing pedestrian and cycle access points will be retained, whilst the main entrance to the building is easily accessible from the street. The Transport Statement identifies the number of cycle parking spaces that are needed, which are provided in a secure facility within the building that can be accessed both externally and internally (from all the flats).
- 11. FLOOD RISK (London Plan Policy SI12 and SI13 and Local Plan Policies EN6 and DMEI9)**
- 11.1 London Plan Policy SI12 and Local Plan Policies EN6 and DMEI9 provide that where development is proposed within Flood Zones 2 and 3a, the applicant will be required to demonstrate that there are no suitable sites available in areas of lower risk. Where no appropriate sites are available, finished floor levels and other mitigation measures should be incorporated into the scheme. The site lies within Flood Zones 2 and 3 and the application is accompanied by a detailed Flood Risk Assessment.

Sequential Test

- 11.2 The ability of the Council to maintain a five-year supply of readily available housing land depends, in no small part, upon windfall sites, such as this, coming forward for development (see paragraph 5.2 above).

- 11.3 The site benefits from a recent prior notification approval for residential conversion at which time flood risk issues were considered. A Flood Risk Assessment was submitted with that application and the Council determined that there were no flood risk reasons to withhold consent. The principle of residential use of the site has been established, with the permitted conversion scheme having three units on the ground floor of the building, whilst the new build development has only two units.

Exceptions Test

- 11.4 In order to pass the Exception Test it is necessary to demonstrate that a development:
- will provide wider sustainability benefits to the community that outweigh the flood risk; and
 - will be safe for its lifetime taking into account of the vulnerability of its users, without increasing flood risk elsewhere, and, wherever possible, reduce the flood risk overall.
- 11.5 The proposal will contribute to the supply of housing land in the Borough and help the Council maintain its five-year housing land supply. It will also bring back into use a vacant commercial site in an accessible location and make best use of the land.
- 11.6 The Flood Risk Assessment describes how the proposal can be made safe for the lifetime of the development. Various flood mitigation measures are proposed that include raising the floor levels and the use of flood resistant construction techniques.

Off-Site Impact

- 11.7 The Flood Risk Assessment proposes that the building will be elevated above ground level with a floodable void beneath the structure in order to provide storage for flood water. The void will be designed in accordance with Environment Agency guidelines, whilst the proposed access ramp will also be an open structure allowing for the flow and storage of water beneath the ramp. The FRA concludes that, with these measures, the proposal will not increase the likelihood of off-site flooding and will, in fact, lead to significant benefits in that more water can be stored on-site in a flood event.

Surface Water Management

- 11.8 London Plan Policy SI13 requires that all new development should aim to achieve green-field run-off rates and manage surface water run-off as close to its source as possible.
- 11.9 The Flood Risk Assessment incorporates a Surface Water Management Strategy comprising a combination of permeable surfacing with geocellular sub-base and a blue/green roof, together with the use of water butts. The FRA confirms that, in conjunction with flow control devices, off-site discharge will be limited to 2.0 l/s, which is a significant betterment when compared to the existing situation.

12. AIR QUALITY ASSESSMENT (London Plan Policies GG3 and SI1 and Local Plan Policies EM8 and DMEI14)

- 12.1 London Plan Policies GG3 and SI1 and Local Plan Policies EM8 and DMEI14 provide that development proposals should actively contribute towards the improvement of air quality, especially within Air Quality Management Areas (AQMA's) and should, as a minimum, be air quality neutral. The subject site does not lie within an AQMA.
- 12.2 The application is accompanied by an Air Quality Assessment which concludes that no mitigation measures are required as air quality objectives are predicted to be met.

12.3 It also considers the proposal against both Building Emissions and Transport Emissions benchmarks. In order to be confirmed as being air quality neutral, a development must meet both standards. The Assessment confirms that the proposal meets the Building Emissions benchmark but not the Transport Emissions benchmark. It, therefore, recommends that further discussions should take place with the Council.

13. CARBON EMISSIONS & SUSTAINABILITY (London Plan Policies GG6, SI2 and SI4 and Local Plan Policy DMEI2)

13.1 London Plan Policies GG6, SI2 and SI4, together with Local Plan Policy DMEI2, require that all major development must be accompanied by an Energy Assessment, are required to make the fullest contribution to minimising greenhouse emissions and should minimise internal overheating. The application includes a Sustainability and Energy Statement that demonstrates full compliance with these policies.

13.2 The Statement confirms that the development has been designed to meet rigorous energy standards and will employ air source heat pump technology to provide space heating and cooling demand. These measures combine to provide a minimum carbon dioxide emissions saving of 35%, compared to Building Regulations Part L 2021 baseline, so significantly exceeding Local Plan requirements.

13.3 Section 4 and 5 of the Statement demonstrate the sustainable credentials of the proposal. They include:

- Development of a brownfield site.
- Development in a location with good access to public transport.
- Proposals incorporated to promote cycling and walking and deter private car ownership.
- Internal water consumption minimised to 105 litres per person per day.
- Incorporation of measures to improve site biodiversity (including biodiverse planting).
- Reduction in flood risk off-site.
- The use of low impact materials.
- Minimisation of waste production during construction and maximising the proportion of waste to be diverted from landfill.
- Minimising energy demand through the specification of low U-Values and low air permeability to reduce heat loss.
- Utilisation of air source heat pump technology to serve the space and water heating demand of the proposed dwellings.
- Employment of rooftop photovoltaic panels to generate zero carbon electricity on-site.

13.4 The Statement concludes that the proposal is in line with the principles of sustainable development as well as the relevant policy requirements.

14. ECOLOGY & BIODIVERSITY (London Plan Policies G5 and G6 and Local Plan Policy EMP7 and DMEI1)

14.1 London Plan Policy G6 and Local Plan Policy EMP7 provide that the Council will seek biodiversity improvements from all development including the provision of green roofs and living walls (see also London Plan Policy G5 and Local Plan Policy DMEI1).

14.2 The application is accompanied by a Preliminary Ecological Appraisal that describes the site as being dominated by building, hardstanding and bare ground habitats and to

broadly be of low ecological value for bats, common invertebrates, hedgehogs and nesting birds. The Appraisal considers the need to undertake surveys for protected species and only recommends that a nocturnal emergence/re-entry survey is undertaken in order to assess whether or not the existing building is used by roosting bats. This can be secured by condition.

- 14.3 It also recommends that buildings, trees and vegetation are removed outside of the bird nesting season and that trees are replaced. It also recommends the creation of boundary habitats in order to create habitats suitable for hedgehogs.
- 14.4 Biodiversity enhancement opportunities (such as a green roof) are recommended which can be secured by condition.

15. FIRE STATEMENT

- 15.1 As required by London Plan Policy D12, the application includes a Fire Statement Strategy.

16. SUMMARY & CONCLUSIONS

- 16.1 It is proposed to demolish Haydon House and replace it with a three-storey block, with accommodation in the roof, to provide 13 flats. Permission already exists (ref 51321/APP/2022/1861) to convert the building into 6 flats.
- 16.2 The Applicant has given consideration to all matters of planning importance, including the design, height, scale, massing and layout of the site and the building, with the aim of creating a quality residential environment and a development that sits comfortably within its context and has an appropriate relationship with its neighbours.
- 16.3 Reports have been prepared to assess potential impacts on the local highway network, flood risk, air quality and biodiversity. Where adverse impacts are identified, appropriate mitigation measures are put forward. Reports also demonstrate that the proposal will meet all relevant environmental, climate change and sustainability targets.
- 16.4 This Statement assesses the scheme against relevant national and local planning policies and demonstrates that this is an accessible and sustainable development.