
HPH 3
Millington Road
Hayes
UB3 4AZ

Planning Statement

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May 2023

Appellant:
Shaviram Hyde Limited

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1. Introduction

1.1 This Statement has been prepared by D. Rose Planning LLP on behalf of Shaviram Hyde Limited (*the applicant*) in support of an application for full planning permission in relation to HPH 3, Millington Road, Hayes, UB3 4AZ.

1.2 The planning application proposes the following development:

Erection of part one, part two storey vertical extension to provide 9no. flats (2no. one bedroom, 5no. two bedroom and 2no. three bedroom) at 7th and 8th floors

1.3 This Statement should be read alongside the following plans and documents:

- Location Plan
- Existing Front Elevation
- Existing Rear Elevation
- Existing Side Elevations
- Existing Section
- Proposed Site Plan
- Proposed 7th Floor Plan
- Proposed 8th Floor Plan
- Proposed Roof Plan
- Proposed Front Elevation
- Proposed Rear Elevation
- Proposed Side Elevations
- Proposed Section
- Air Quality Assessment
- Design and Access Statement
- Daylight and Sunlight Report
- Energy and Sustainability Statement
- Fire Statement
- Residential Noise Assessment
- Sustainable Drainage Statement
- Transport Note

1.4 This Statement is structured as follows:

- Section 1 – continues by describing the site’s context and outlining the relevant planning history;
- Section 2 – describes the proposed development;
- Section 3 – highlights the main planning considerations; and
- Section 4 – summarises this Statement.

Site Context

- 1.5 The application site (0.44ha) is located on the Hyde Park campus currently accommodates a 7 storey building (including ground floor) with associated car parking. The building is bounded by its car park to the north (and North Hyde Road beyond), Millington Road to the south and east, and a roundabout to the west. Millington Road is not an adopted highway.
- 1.6 The building is of a L-shape form with both wings facing Millington Road and was historically constructed for office use but is in the process of being converted to 113 flats.
- 1.7 The exterior of the building is predominantly treated in a cladding system with brickwork on the stair cores and flanks. The developer is currently carrying out alterations to the facades including installation of replacement cladding and windows following the grant of planning permission.
- 1.8 The site has a PTAL of 4 equating to a good level of accessibility by public transport and by foot.
- 1.9 Bus services can be accessed from stops located on Bourne Avenue, approximately 160 metres west of the site, and also on North Hyde Road with additional services accessed from bus stops on Station Road, approximately 450 metres from the site.
- 1.10 Railway services on the Elizabeth Line (and GWR) are available from Hayes and Harlington Railway Station, which is situated within 700 metres’ walking distance (10 minutes by foot) from the site.
- 1.11 The application site is not in a conservation area and not within the setting of any listed buildings. The Botwell: Thorn EMI conservation area, the closest conservation area to the site, is located to the north of the railway line and in itself has undergone extensive recent changes including the construction of taller buildings.

Planning History

- 1.12 The building benefits from approvals under the GPDO. This includes the grant of prior approval under reference: 72360/APP/2021/1709 for development comprising of the change of use from B1(a) office to 113 residential units. It is anticipated that this development will be completed in 2024.
- 1.13 Planning permission has also been granted under reference: 72360/APP/2022/148 for External alterations to facades to include replacement and alteration of cladding, windows and doors, installation of render to ground floor and juliet balconies to upper floors. This permission has also been implemented and works are ongoing.
- 1.14 Planning permission has been granted on the vacant HPH4 site (opposite) for a three-block building of up to nine storeys accommodating 131 flats.
- 1.15 Planning permission has also been granted for redevelopment of the Keith House site located on the northern side of North Hyde Road.

2.0 Proposed Development

- 2.1 The proposals entail a two storey vertical extension over the east-wing of the building to create a 7th and a 8th floor with one storey roof extension to north-south wing to provide nine additional dwellings.
- 2.2 The two storey element incorporates six duplex units with the single (7th) floor extension providing three further dwellings.
- 2.3 The 7th floor is recessed on all sides to enabling the creation of private terraces for the flats. There are six further terraces at 8th floor, one for each duplex apartment.
- 2.4 The extension would be predominantly finished with metal cladding system in 2 grey tones together with grey windows to match the colour of those to be installed on the floors below.
- 2.5 The proposed schedule of accommodation is as follows¹:

Flat No.	Description	Size	Private Amenity Space
701	2b/3p duplex	74sqm	25sqm
702	1b/2p duplex	68sqm	20sqm
703	3b/5p duplex	99sqm	33sqm
704	3b/4p	86sqm	41sqm
705	2b/3p	63sqm	35sqm
706	2b/3p	62sqm	32sqm
707	2b/4p duplex	82sqm	25sqm
708	1b/2p duplex	68sqm	21sqm
709	2b/3p duplex	74sqm	26sqm

- 2.6 A blue roof is proposed above the single storey extension with a green roof above both single and two storey elements. It is proposed to install a photovoltaic array above the higher section of roof.
- 2.7 Following completion of development approved under reference: 76655/APP/2021/3039, there would be 68 car parking spaces on site including 6 disabled spaces with 3 motorcycle spaces. 14 of the 68 parking spaces would have active electrical vehicle charging points. No additional car parking is proposed as part of this application. However, 14 additional cycle parking spaces are proposed within a covered and secure

¹ rounded to the nearest whole number

enclosure equating to an overall provision of 131 spaces. The wider site layout would be consistent with landscaping details approved under reference: 72360/APP/2022/3449.

- 2.8 Provision has been for the storage of general waste and recyclables within the refuse enclosure to the rear (north) of the building.
- 2.9 Further details of the proposed development including the rationale for the design approach are set out within the Design and Access Statement.

3.0 Planning Considerations

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act, 2004, requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 For the purpose of determining this application, the relevant documents of the Development Plan comprise the London Borough of Hillingdon's (LBH) Local Plan: Part 1 (2012), Local Plan: Part 2 (2020) and the new London Plan 2021.
- 3.3 The National Planning Policy Framework (NPPF) represents up-to date Government policy and is a material consideration for planning decisions. The NPPF sets out a presumption in favour of sustainable development including where the Development Plan is silent, absent or the policies are out of date.
- 3.4 Planning Practice Guidance (NPPG) states that "if decision takers choose not to follow the National Planning Policy Framework, clear and convincing reasons for doing so are needed." (Paragraph: 006 Reference ID: 21b-006-20190315)
- 3.5 It is noted that LBH and the GLA has published a number of SPGs and SPDs including the LBH's Planning Obligations Supplementary Planning Document.
- 3.6 It is considered that the relevant planning issues are as follows:
- Principle of Development;
 - Character and Appearance and the Impact upon Heritage Assets;
 - Impact on Residential Amenity;
 - Standard of Accommodation;
 - Traffic and Transportation Issues; and
 - Environmental Quality;

Principle of Residential Development

- 3.7 Local Plan Policy H1 sets out a target for a minimum number of 425 new homes to be built per year over the Plan period.
- 3.8 Policy DME 2 states that proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted subject to criteria including there is no realistic prospect of the land being reused for employment purposes.

- 3.9 The London Plan encourages making the best use of land to support additional homes (Policy GG2) and create a housing market that works better for all Londoners (Policy GG4).
- 3.10 Table 4.1 sets out a 10 year housing target for Hillingdon of 10,830 net completions (for the period ending 2028/29).
- 3.11 The National Planning Policy Framework (NPPF) represents up-to date Government policy and is a material consideration for planning decisions. The NPPF sets out a presumption in favour of sustainable development including where the Development Plan is silent, absent or the policies are out of date.
- 3.12 Paragraph 69c of NPPF including Paragraph 69c) notes that local planning authorities should support the development of windfall sites through their policies and decisions – “giving great weight to the benefits of using suitable sites within existing settlements for homes.”
- 3.13 Paragraph 120d) states that “planning decisions should 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.” Paragraph 120e) promotes support for opportunities to use the airspace above existing residential and commercial premises for new homes.
- 3.14 The principle of residential development has already been established on the site and whilst the proposals themselves do not entail the loss of employment space, there is no realistic prospect of the site being used for employment purposes in the future.
- 3.15 It is noted that the application site is a windfall site (without either an employment or housing allocation) but is in area is subject to significant change with an increasing residential character including the development of the HPH4 site (opposite).

Character and Appearance and Impact upon Heritage Assets

- 3.16 Local Plan Policy HE1 states that the Council will conserve and enhance Hillingdon’s distinct and varied environment, its settings and the wider historic landscape including listed buildings and conservation areas. Policy DMHB 1 sets out the expectation that development proposals avoid harm to the historic environment.
- 3.17 Policy BE1 sets out that development is expected to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. All new developments should be achieve a high quality of design in all new buildings, alterations and extensions. Development should also make a positive contribution to the

local area in terms of layout, form, scale and materials. The Policy further promotes the improved quality of public realm and create safe and secure environments.

- 3.18 Policy DMHB 11 states that all development including extension will be required to be designed to the highest standards and incorporate principles of good design. These include harmonising with the local context by taking into account the surrounding and using high quality building materials.
- 3.19 Policy DMHB 12 seeks to ensure that development is well integrated with the surrounding area including incorporating landscaping treatment that is suitable for the location. Policy DMHB 14 states that all developments will be expected retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- 3.20 Policy DMHB 15 states that all new development should provide safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.
- 3.21 Policy DMHB 17 seeks to ensure that all new residential development takes account of the density matrix included within the Plan.
- 3.22 Policy D3 of the London Plan seeks to optimise site-capacity through a design-led approach. This includes enhancing local context by delivering buildings and spaces that positively respond to local distinctiveness and proposals of high quality, with architecture that pays attention to detail.
- 3.23 Policy D4 encourages good design through increase scrutiny and seeking to maintain design quality through to the completion of the development.
- 3.24 Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 3.25 The NPPF attaches great importance to the design of the built and historic environment with good design considered to be a key aspect of sustainable development. Paragraph 130 states that planning "decision should aim to ensure that developments:
- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change;
 - establish or maintain a strong sense of place... to create attractive, welcoming and distinctive places to live, work and visit;
 - optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development...”
- 3.26 Paragraph 134 sets out that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design. Conversely, significant weight should be given to outstanding or innovative designs which promote high levels of sustainability.
- 3.27 Paragraph 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 3.28 Paragraph 199 continues that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 3.29 Paragraph 200 outlines that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings should be exceptional.
- 3.30 Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 3.31 As is evident from the Design and Access Statement, the architects have adopted a highly considered approach to ensure that the scale, proportions and character of the proposed development is sensitive to its context including the existing building.

- 3.32 The density of development is reflective of an urban location and similar to that consented on other sites within the area. The height and scale of the development is also considered contextually appropriate especially once accounting for development in the pipeline. In addition, given its relative distance from the Botwell: Thorn EMI conservation area and taking account of the redevelopment proposals for the Keith House site, it is not considered that the development would impact upon a heritage asset with no harm arising.
- 3.33 As set-out in both the Design and Access Statement and evident from the application drawings, the proposed part one, part two storey extension would be set-in from the facades reducing its mass and ensuring that it is not visually dominant. The choice of material palette, including the use of grey cladding, frames the building and complements the external materials including windows used on the lower floors. It is considered that the use of two grey tones with a darker colour between window bays successfully provides vertical emphasis and added interest to the facades.
- 3.34 It is highlighted that the applicant will be undertaking work to improve the appearance of the wider site with a scheme of landscaping approved under ref: 72360/APP/2022/3449. This will deliver an attractive environment for future residents and streetscape benefits.
- 3.35 The proposed development accords with the design principles set out within the NPPF and consistent with the objectives and policies of the Development Plan.

Impact on Residential Amenity

- 3.36 Policy DMHB 12 states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 3.37 London Plan Policy D3 sets out that development proposals should deliver appropriate outlook, privacy and amenity.
- 3.38 The NPPF notes that planning decisions should ensure that developments create places, with a high standard of amenity for existing and future users (Paragraph 130f)).
- 3.39 The application is supported by a Daylight and Sunlight Report which considers the impact of the proposed extension on the daylight and sunlight to surrounding residential properties, amenity spaces, and internally to the scheme itself. The assessment of the proposals has been carried out in accordance with the methodologies contained in the BRE's Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2022).

- 3.40 The reports concludes that the majority of rooms and windows in the neighbouring consented development (HPH4) meet the BRE target values for daylight and sunlight. Where this is not the case, either the window is significantly recessed into the building thereby limiting access to daylight, or the impact is considered minor adverse at worst and therefore not significant.
- 3.41 With regard to the new flats themselves, the analysis shows that all rooms meet their target daylight value and that all units containing at least one south-facing window meet their target sunlight value. Given the similar results for the residential units below the proposed extension, these results are also considered acceptable.
- 3.42 It is noted that window to window distance between the proposed 7th and 8th floors and the northern façade of the consented HPH4 development is approximately 23 metres (compared to 21 metres on the lower floors). Accordingly, it is not considered that development the development would impact upon the privacy of future residents. It is further noted that screens between the proposed terraces would protect the amenity of residents of the development.
- 3.43 The application is supported by a Residential Noise Assessment which sets out that the development has been and assessed against the acoustic design criteria and outlines a sound insulation scheme. This included recommendations for glazing and acoustic barrier on terraces together with the inclusion of ‘whole dwelling’ mechanical ventilation. It is further confirmed that the windows would remain openable for purge.

Standard of Accommodation and Housing Mix

- 3.44 Policy DMHB 16 requires housing development to adequate internal space in compliance with National Space standards.
- 3.45 Policy DMHB 18 states that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Standards are set out in Table 5.3 and it is noted that these exceed those set out in the London Plan.
- 3.46 Policy DMH 2 states that a mix of housing units of different sizes will be required in residential development.
- 3.47 Policy D6 of the London Plan states that housing development should be of high quality design and provide adequately-sized rooms and accord with the standards set out in Table 3.1.

- 3.48 Paragraph 130 of the National Design Guide states that “the appropriate size, shape and position for an external amenity space can be defined by considering:
- how the associated building sits in the wider context, including access to public and open spaces;
 - how the amenity space will be used, what for, and by whom;
 - environmental factors that may affect its usability, such as sunlight and shade, noise or pollution;
 - wider environmental factors affecting its quality or sustainability, such as a green corridor or drainage.”
- 3.49 Policy D12 of the London Plan sets out that to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. Applications for major development should also be accompanied by a Fire Statement.
- 3.50 The dwellings have been designed to meet the relevant internal minimum space standards with appropriately-sized bedrooms and the provision of storage space.
- 3.51 Each flat would benefit from their own private amenity space in the form of roof terraces exceeding the LBH standard of 20sqm for one bedroom flat, 25sqm for a two bedroom and 30sqm for a three bedroom. The private amenity spaces have been designed to be useable with opportunities for planting (in boxes) as well as seating and outdoor activities.
- 3.52 The application is supported by a Fire Statement which describes the access arrangements for fire appliances, evacuation assembly arrangements, details of the means of escape as well as the fire resistance of the construction materials. The proposed development is therefore in compliance with London Plan Policy D12.

Traffic and Transportation Issues

- 3.53 Local Plan Policy T1 steers development to the most accessible locations in order to reduce their impact on the transport network. In addition, all development should encourage access by sustainable modes and include good cycling and walking provision.
- 3.54 Policy DMHB 11 states that development proposals should make sufficient provision for storage space for waste and recycling.
- 3.55 Policy DMHB 12 sets out that development should provide safe and direct pedestrian and cycle movement through the space.

- 3.56 Policy DMT 1 30 states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable, they are required to be accessible by public transport, walking and cycling; maximise safe, convenient and inclusive accessibility; adequately address delivery, servicing and drop-off requirements; and have no significant adverse transport impacts on the local and wider environment, particularly on the strategic road network. The Policy further requires that a satisfactory Transport Assessment and Travel Plan is prepared if the proposals meet thresholds.
- 3.57 Policy DMT 2 adds that development proposals must ensure that safe and efficient vehicular access to the highway network is provided together with safe, secure and convenient access and facilities for cyclists and pedestrians. Suitable mitigation measures are required to any traffic impacts in terms of capacity and functions of existing and committed roads.
- 3.58 Policy DMT 5 further promotes access for pedestrians and cyclists including the provision of cycling parking in accordance with standards.
- 3.59 Policy DMT 6 seeks compliance with car parking standards.
- 3.60 London Policy T2 seeks to create attractive and liveable neighbourhoods including healthy streets and an environment in which people actively choose to walk and cycle as well as reduce the dominance of the car.
- 3.61 Policy T4 states that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity as well as not increasing road danger.
- 3.62 Policy T5 emphasises the importance of providing adequate cycle parking with specific standards set out in Table 10.2 and LBH Policy DC35 promotes safe and secure cycle parking appropriate to the nature, scale and location of development.
- 3.63 Policy T6 notes that car parking should be restricted in line with levels of existing and future public transport accessibility.
- 3.64 Policy T7 sets out that development proposals should facilitate safe, clean, and efficient deliveries and servicing.
- 3.65 The NPPF highlights that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (Paragraph 105).

- 3.66 Paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 3.67 The application is supported by a Transport Note (TN) which builds on the Transport Statement prepared for the 113 flat conversion. It is noted that the site has a PTAL of 4 with convenient access to bus stops on Bourne Avenue and North Hyde Road and Hayes and Harlington Station (with access to the Elizabeth Line) within convenient walking distance.
- 3.68 The development approved under reference 72360/APP/2021/1709 will provide a total of 68 car parking spaces included 6 disabled spaces. 14 of the spaces would have 'active' charging points for electrical vehicles with the remaining 'passive' (for future supply as needed).
- 3.69 The TN notes that no additional parking spaces would be provided for the 9 new flats equating to an overall parking ratio of 0.56 spaces per unit. The TN highlights that the level of provision is within London Plan criteria and would remain greater than that approved on the HPH4 site (opposite).
- 3.70 14 additional cycle spaces are proposed within a secured and covered shelter in accordance with the London Plan standards.
- 3.71 Delivery and servicing would be consistent with recently approved arrangements for the 113 flat development and are therefore considered to be acceptable.
- 3.72 It is further noted that that residents of the conversion development would benefit from a Travel Plan, the details of which would be submitted to LBH for approval prior to occupation. It is anticipated that these measures to promote sustainable travel would also be available to residents of the additional nine flats.
- 3.73 The TN concludes that the proposed development of nine additional flats accords with prevailing national, regional and local policy and is in a sustainable location. The residual cumulative impacts are not severe, nor does the proposed development give rise to road safety concerns.

Environmental Quality

- 3.74 Local Plan Policy EM1 seeks to ensure that climate change adaptation and mitigation is addressed at every stage of the development process.

- 3.75 Policy DMEI 2 states that all developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.
- 3.76 Policy DMEI 7 sets out that design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site.
- 3.77 Policy DMEI 10 promotes water management and efficiency including requiring developments to make adequate provision for the control and reduction of surface water run-off rates. Developments should also be drained by a SuDS system and incorporate water efficiency measures and water use limits.
- 3.78 Policy EM6 seeks to direct new development away from Flood Zones 2 and 3. The Policy further states that all developments should incorporate SUDS unless it demonstrated that it is not viable.
- 3.79 Policy EM7 sets out that Hillingdon's biodiversity will be enhanced with green roofs and living walls promoted.
- 3.80 Policy EM8 seeks to safeguard and improve all water quality and requires all new development to incorporate water efficiency measures. The Policy further sets out that development should not cause a deterioration in local air quality and should ensure the protection of both existing and new sensitive receptors. The Council will also seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated. In addition, proposals for development on contaminated land should include strategies that reduce the impact on surrounding land uses.
- 3.81 Policy DMEI 12 sets out that proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants and that conditions will be imposed to ensure that all necessary remedial works are implemented prior commencement of the development.
- 3.82 Policy DMEI 14 sets out that developments should as a minimum be at least "air quality neutral" benchmarks. Sufficient mitigation should also be provided to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new.
- 3.83 Policy EM11 states that the Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site.

- 3.84 Policy DMH 11 promotes the provision of landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.
- 3.85 London Plan Policy GG3 seeks to ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems.
- 3.86 Policy GG6 promotes efficiency and resilience including improvements to energy efficiency and supporting the move toward s a low carbon economy. Buildings should also be designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.
- 3.87 Policy G6 states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 3.88 Policy SI1 states that development proposals should not lead to further deterioration of existing poor air quality and must be at least air quality neutral.
- 3.89 Policy SI2 sets out that major development should be net zero carbon. Targets are not set for minor development.
- 3.90 Policy SI4 states that Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 3.91 Policy SI5 seeks to ensure that development proposals minimise the use of mains water.
- 3.92 Policy SI 12 promotes flood risk management. Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- 3.93 Policy SI 13 promotes sustainable drainage and highlights that 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.
- 3.94 Paragraph 154 of the NPPF states that “new development should be planned in ways that: avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including

through the planning of green infrastructure; and can help to reduce greenhouse gas emissions, such as through its location, orientation and design...”

- 3.95 Paragraph 162 of the NPPF seeks to direct development away from areas at highest risk of flooding. Local planning authorities should also ensure that flood risk is not increased elsewhere (Paragraph 164).
- 3.96 Paragraph 174a) of the NPPF sets out that planning decisions should contribute to and enhance the natural and local environment including by protecting and enhancing valued landscapes. Paragraph 174d) further states they should minimise impacts on and provide net gains for biodiversity.
- 3.97 Paragraph 174e) of the NPPF sets out that planning decisions should contribute to and enhance the natural and local environment including by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. The remediation of contaminated land is also sought.
- 3.98 Paragraph 183 states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 3.99 Paragraph 185 requires planning decisions to ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.
- 3.100 The application is supported by an Energy and Sustainability Statement. The reports notes that an energy strategy for the development has been developed by following the GLA energy hierarchy of lean, clean, green and seen. This includes passive and active design measures including a roof-top PV array in order to achieve the required carbon reductions.
- 3.101 The development will aim to minimise waste during the construction phase by adhering to a Construction Management Plan which follows the principles of the waste hierarchy. The development would also use low impact materials to minimise the impact upon the environment as far as possible. It is further confirmed that the development aims to reduce mains water use to less than 105 litres per person per day in accordance with policies.

- 3.102 It is highlighted that a Phase II Geo-environmental report and Remedial Scheme Report and Verification Plan have been approved under reference 72360/APP/2023/724. It is considered that the extension development subject to this current application would not give rise to contamination concerns and risks which are not already controlled by the above and 72360/APP/2021/1709. Accordingly, the development should be considered acceptable with regard to contamination risk.
- 3.103 The application is supported by an Air Quality Assessment (AQA). The AQA includes a qualitative assessment of dust levels associated with the development and concludes that impact of dust soiling and PM₁₀ during construction can be reduced to negligible through appropriate mitigation measures.
- 3.104 The AQA further concludes that the proposed development is air quality neutral in relation to the building and transport emissions.
- 3.105 It is considered that the proposed development through the incorporation of an extensive green roof and planting on the terraces would provide the opportunity for a net biodiversity gain. There are no ecological constraints which impact upon the development of the proposed extension.
- 3.106 The application is accompanied by a Sustainable Drainage Strategy. The strategy demonstrates that SuDS have been fully considered and this regard, it is proposed to provide a green roof of c500sqm (across both the single and two storey extension) and a c200sqm blue roof (above the single storey).
- 3.107 The strategy further concludes that no significant sources of flooding, flood history or sewer capacity issues have been identified on site or in the surrounding area, and it is considered that the site can be operated safely without increasing flood risk elsewhere given that no significant sources of flooding have been identified.

Other Matters

- 3.108 Local Plan Policy DMCI 7 notes that infrastructure requirements will be predominantly addressed through the Council's CIL with planning obligations sought on a scheme-by-scheme basis.
- 3.109 The NPPF sets out that “planning obligations should only be sought where they meet all of the following tests:
- necessary to make the development acceptable in planning terms;

- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.” (Paragraph 57)

3.110 The applicant has no objection to a planning condition that meets the tests under Paragraph 56 of the NPPF.

4.0 Summary

- 4.1 This Statement together with the other application documents demonstrates that the proposed development is in accordance with the Development Plan and is supported by material considerations including the NPPF.
- 4.2 The proposals will deliver an appropriate design solution which fully accounts for the site's character and context and would not impact upon the setting of heritage assets. The development would also safeguard the amenity of neighbouring residents.
- 4.3 The proposed provision of 9 additional flats is considered entirely appropriate given the site's sustainable location including its high level of accessibility by foot, cycling and public transport.
- 4.4 The proposals would provide residential accommodation which complies with internal space standards and provides generous and useable private amenity spaces of a scale appropriate for its intended users and in accordance with policy requirements.
- 4.5 The proposed development is not considered to give rise to any environmental or infrastructure concerns and has been designed to accord with the principles of sustainable design and construction.

Planning Benefits

- 4.6 The proposed development delivers significant planning benefits including the following:
- Massing, and scale of development which relate sensitively and positively to its context;
 - The creation of 9 residential units of an appropriate mix of flat sizes making a contribution towards LBH's housing requirements and better utilising an under-used site within an accessible location;
 - High quality internal living accommodation benefiting from large habitable rooms, well-lit by natural lighting and offering good outlook;
 - Incorporates sustainable design measures to ensure reduced carbon emissions by users and water consumption as well as minimising waste material; and
 - Includes both blue and green roofs providing benefits for biodiversity and reducing surface water run off.