

# Land at Status Park, Nobel Drive

## Planning Statement

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## 1. Introduction

- 1.1. This Town Planning Statement has been prepared on behalf of our client 'MBH Heathrow Ltd' to support a full planning application for a new residential building at Land at Status Park, Nobel Drive.
- 1.2. The description of development is as follows:

*"Redevelopment of the existing site to provide a 6 storey residential building to provide 67no. residential units, together with associated landscaping and car parking. Reconfiguration of car parks at Nobel Drive and provision of additional landscaping."*

### Accompanying Reports

- 1.3. This statement describes the development proposals against the relevant planning policy framework. It should be read in conjunction with the accompanying application drawings and a number of specialist reports which have been prepared to support the application. These reports include the following:
  - Air Quality Assessment prepared by Air Quality Assessments Ltd;
  - Design and Access Statement prepared by Osel Architecture;
  - Daylight and Sunlight Assessment prepared by T16 Design;
  - Flood Risk Assessment and Drainage Statement prepared by EAS;
  - Fire Statement prepared by Accendo;
  - Energy Statement prepared by T16 Design;
  - Sustainability Statement prepared by T16 Design;
  - Environmental Noise Survey and Acoustic Design Statement prepared by Hann Tucker Associates;
  - Phase 1: Preliminary Risk Assessment prepared by Phlorum;
  - Transport Assessment prepared by Mayer Brown;
  - Travel Plan prepared by Mayer Brown;
  - Arboricultural Report prepared by Crown Trees;
  - Tree Schedule prepared by Crown Trees;
  - Landscape Report (incl. UGF) prepared by BD Landscape Architects; and
  - Financial Viability Report prepared by James Brown Consulting

- 1.4. This report includes the following sections:
  - Chapter 1 – Introduction;
  - Chapter 2 – Background;
  - Chapter 3 – Planning History;
  - Chapter 4 – The Proposal;
  - Chapter 5 – Planning Policy Context;
  - Chapter 6 – Planning Assessment; and
  - Chapter 7 – Conclusion

## 2. Background

- 2.1. The site is situated due north east of Heathrow Airport on the northern side of the Bath Road (A4) and is accessed via Nobel Drive. Heathrow Airport perimeter fence is located approximately 0.25 miles to the south. The surrounding area is characterised by mixed use developing including a number of residential buildings within and around Status Park, together with commercial, office and hotel buildings within the local vicinity.
- 2.2. The site comprises an existing office building named Building 2, Status Park and adjacent existing car parks. The proposed building is located to the east of the existing office building on the existing car park. The existing car park has approximately 85 car parking spaces including 3 disabled spaces.
- 2.3. The Site is not located within a site allocation or designation, as outlined within the adopted Site Allocations and Designations (2020) and Hillingdon Policies Map (2020). The Site is located within the Heathrow Opportunity Area, as identified within the London Plan (2021). Its previous designation within the 'Hotel and Office Growth Location' has been removed by the Development Management Policies (2020).
- 2.4. The site is well connected via bus routes, with a number of bus stops on Bath Road; numerous bus, coach and rail services also serve the nearby Heathrow Airport Terminals 1, 2 and 3 and other airport terminals. The nearest underground and train stations are located at the airport terminals; these are easily accessed by bus from the development site. The airport is served by the Piccadilly Line, the Heathrow Express train service from Paddington and Heathrow Connect service. The site has a Public Transport Accessibility Level (PTAL) of 3.
- 2.5. There are no listed buildings, Scheduled Monuments or World Heritage Sites on or in close proximity to the site.
- 2.6. The Environment Agency flood map confirms that the site is set within flood zone 1 (lowest risk of flooding).

### 3. Planning History

- 3.1. A desk-top research of the planning history records held by the Council has been undertaken. Key recent applications of relevance to the development proposals are provided below:

Reference	Description	Decision
<b>Building 2, Status Park</b>		
74423/APP/2018/4437	Redevelopment of the existing car park to provide a 6-storey building comprising 140-room hotel (Use Class C1) including the reconfiguring of car parking spaces across the site to secure 1:1 parking for the residential buildings (Buildings 2, 3 and 4), associated access, car parking and hard and soft landscaping.	Approved April 2020
72408/APP/2018/972	Proposed construction of roof extension to second floor to provide 7 x 1 bed and 1 x 2 bed flats	Approved October 2017
72408/APP/2017/3021	Prior approval for the change of use from Use Class B1 (a) (offices) to Use Class C3 (Residential) to provide 46 self-contained units (6 x studio flats, 38 x 1 bed flats and 2 x 2 bed flats) with provision of ca parking, cycle and refuse storage.	Approved August 2017
72408/APP/2016/4382	Prior approval for the change of use from Use Class B1 (a) (offices) to Use Class C3 (Residential) to provide 42 self-contained units (32x1 bed and 10 x 2 bed) with provision of cycle and effuse storage.	Approved January 2017

- 3.2. Application references 72408/APP/2017/3021 (prior approval for 46 residential units) and 72408/APP/2018/972 (roof extension for 8 units) have been implemented.

#### Surrounding Area

- 3.3. There have been a number of planning approvals for residential development in close proximity to the site. These are outlined in the table below:

Location / Reference	Description	Decision
<b>Building 3, Status Park, Nobel Drive, UB3 5EY</b>  69183/APP/2016/4299	Prior Approval for the change of use from Use Class B1(a) (Offices) to Use Class C3 (Residential) to provide 30 self-contained flats (15 x 1 bed and 15 x 2 bed units) with provision of cycle and refuse storage.	Approved January 2017
<b>Building 3, Status Park, Nobel Drive, UB3 5EY</b>  69183/APP/2017/1363	Prior Approval Application for the change of use from Use Class B1(a) (Offices) to Use Class C3 (Residential) to provide 36 self-contained flats (4 x studios, 29 x 1-bed and 3 x 2-bed units) with provision of recycling and refuse storage.	Approved June 2017
<b>Building 4, Status Park, Nobel Drive, UB3 5EY</b>  46616/APP/2017/1362	Prior Approval Application for the change of use from Use Class B1(a) (Offices) to Use Class C3 (Residential) to provide 45 self-contained flats (38 x 1-bed and 7 x 2-bed units) with provision of recycling and refuse storage.	Approved June 2017
<b>Princess House, Nobel Drive, UB3 5EY</b>  50524/APP/2017/4410	Erection of two additional storeys at roof level to existing building to provide 2 x 1-bed, 7 x 2-bed self contained flats and associated works	Approved June 2017
<b>Q3 House, Mondial Way</b>  72234/APP/2016/3531	Change of use from Use Class B1 (Offices) to Use Class C3 (Residential) to form 42 x 1 bed units (Prior Approval)	Approved December 2016
<b>Axis House, 242 Bath Road</b>  43794/APP/2014/1542	Change of use of offices to 64 Flats (Application for Prior Approval under Schedule 2 Part 3 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended))	Approved May 2014

### Pre-application Advice

- 3.4. Formal Pre-application consultation has been undertaken with Hillingdon Borough Council (ref. 74423/PRC/2022/165) including a meeting on the 9<sup>th</sup> September 2022. The scheme presented to the Council was for a 69 unit residential building over 7 storeys, with 53 car parking spaces and associated landscaping.
- 3.5. The summary of comments received is as follows:

- The proposal for residential development in this location is consistent with the Development Plan and the evolving character of Bath Road. Officers also confirmed the site has been removed from its designation as an area appropriate for hotels within the new Local Plan Part 2 (2020).
- Scheme viability should be tested early on in the design process as it is expected to deliver 35% affordable housing.
- There are too many 1 bed units and not enough family units. Aim for 25% family units (3+ bedroom).
- Density standards will be applied flexibly and should follow the design-led approach.
- The design is similar to that of the approved hotel and more residential style elements should be incorporated.
- The materiality incorporates grey brickwork and metallic cladding which is not in keeping with the local area which is predominantly redbrick, and does not relate to its proposed residential use.
- The building height, at 7 storeys, must be justified within the application particularly in relation to the Green Belt to the east.
- Ground floor – Consider creating a 'base' through materiality. It is also poorly activated with large blank frontages. The entrance on both sides is fully supported, but the southern entrance needs more consideration.
- Concern over the proposed car parking. 53 spaces is considered overprovision and 18 of these are double-stacked, which are unacceptable. This also reduces opportunity for amenity space provision. Wheelchair parking should also be provided. Consider how parking across all buildings within Status Park can be brought down to 0.6 ratio within this application.
- The number of dual aspect units must be maximised. The single aspect north facing units are unacceptable.
- Proposal must provide some on-site communal amenity space as well as children's playspace. Consider how public open space could be provided within the wider site on land which currently accommodates surplus parking, adjacent to the green belt.
- Consider how proposals can meet UGF score of 0.4.

- 3.6. Following obtaining pre-application advice the proposed scheme has been amended having taken into account the advice received.

## 4. The Proposal

- 4.1. The development proposals seek to provide a 6 storey building providing 67 residential units within Land at Status Park. The development proposals also propose reconfiguration of existing car parks and comprehensive landscaping.
- 4.2. It is proposed for the existing office building (Building 2) to be retained. The planning application for the change of use of the property to residential (application ref: 72408/APP/2017/3021) has been implemented.
- 4.3. The proposed building will comprise of approximately 5,800sqm (GIA) over 6 storeys comprising 67 residential flats, as well as bin store and cycle parking.

### **Residential Units**

- 4.4. A total of 67 residential units are proposed, within the following unit mix:
  - 1-bedroom: 27 units
  - 2-bedroom: 23 units
  - 3-bedroom: 17 units

- 4.5. A total of 7 of the proposed units are wheelchair accessible units.

### **Access**

- 4.6. Vehicular access to the site will remain from Nobel Drive. It is proposed to the existing entrance into the car park to be revised and relocated to the west. The new access will serve the proposed car parking spaces on site, as well as the new pedestrian access adjacent to the building façade.
- 4.7. The development utilises existing pedestrian and cyclist access within the sites vicinity. New connections are provided onto this existing infrastructure through a footpath to the north of the site.
- 4.8. There are a number of pedestrian accesses into the building, on both the northern and southern elevations of each building 'wing.'

### **Parking**

- 4.9. A revised parking layout is proposed across the Site, including replacement of existing surplus car parking with landscaping.
- 4.10. The proposed development will provide 149 car parking spaces across the Site, a reduction of 95 parking spaces. The proposed parking will include 4 disabled spaces and 4 electric vehicle charging spaces, to be located within the forecourt of the proposed building.

- 4.11. In addition, a total of 121 cycle parking spaces will be provided. The long stay spaces will be provided within cycle stores in the building or within a secure and lockable cycle store adjacent to the building. A further 4 short stay spaces are provided within the building forecourt.

### Layout

- 4.12. The proposals maintain the existing building line and landscape buffer along Bath Road. An L shape building is proposed fronting onto Bath Road and Nobel Drive. The existing car parks have been reconfigured to allow for landscaping throughout the Site.
- 4.13. A separation distance of circa 17m is proposed between the west façade of the proposed building and the front of Building 2. The internal layout comprises a number of pedestrian entrances, along with bin and cycle stores at ground floor level. The first to fifth floors are of an identical layout.

### Materials

- 4.14. The proposed materials respond to the existing material palette present in the surrounding area. The proposed building has been designed to respond to the surrounding context. The choice of materials and fenestration will help to break up the mass of the built form and to emphasise the prominent corner on Bath Road.

### Landscaping

- 4.15. Landscaping is proposed across the Site, to include hard and soft landscaping appropriate to the character of the area. Significant greening is proposed around the proposed building, including grassed amenity space, SUDS, green roof and tree planting. Across the wider Site, existing car parks are reconfigured to allow space for additional planting and landscaping.
- 4.16. A total of 16 trees are to be removed, while 49 trees will be planted as part of the proposed development.
- 4.17. The landscaping scheme includes 208sqm of children's playspace, immediately north of the proposed building.

## 5. Planning Policy Context

- 5.1. This section of the statement provides a brief summary of the relevant planning policy framework.
- 5.2. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004:

*“When making any determination under the planning acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”.*
- 5.3. For the purpose of section 38(6) of the Planning and Compulsory Purchase Act, the Development Plan for the site comprises the following:
  - The Hillingdon Local Plan: Part 1 – Strategic Policies (2012);
  - The Hillingdon Local Plan: Part 2 – Development Management Policies (2020);
  - The Hillingdon Local Plan: Part 3 – Site Allocations and Designations (2020); and
  - The London Plan (2021).
- 5.4. Material Considerations include; the National Planning Policy Framework (NPPF); Planning Practice Guidance (PPG); regional and supplementary planning guidance/documents (SPG/SPDs); and emerging planning policy documents.

### NATIONAL PLANNING POLICY AND GUIDANCE

#### National Planning Policy Framework (NPPF)

- 5.5. A revised National Planning Policy Framework (NPPF) was published by the UK Government's Ministry of Housing, Communities and Local Government on 24 July 2018. This is the first revision of the National Planning Policy Framework since 2012. The NPPF provides an overarching framework for the production of local policy documents and planning decisions.
- 5.6. At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). Sustainable development is defined as having three overarching objectives: economic, social and environmental.
- 5.7. Details of these objectives are provided at Paragraph 8, stated below:

***“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;***

**A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment; with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

**An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

- 5.8. As detailed at Paragraph 10 so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.
- 5.9. Chapter 9 provides guidance on locating development in a location that promotes use of sustainable transport infrastructure. Paragraph 103 states:

*“The planning system should actively manage patterns of growth in support of these objectives. 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. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”.*
- 5.10. Chapter 11 outlines the Government's stance on making effective use of land. Key aspects of Paragraph 118 which are of relevance to the development proposals are provided below:
  - a) *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
  - b) *Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example, converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and*
  - c) *Support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extension where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers”.*
- 5.11. Paragraph 80 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be

a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

- 5.12. Paragraph 118 of the NPPF states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Paragraph 118 further states that planning policies and 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 (for example converting space above shops, and building on or above service yards, car parks, lock ups and railway infrastructure).
- 5.13. Paragraph 124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good Design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

## REGIONAL PLANNING POLICY

### The London Plan (2021)

- 5.14. The London Plan, published March 2021, sets out the overall strategic plan for London over the next 20-25 years. The London Plan is based upon three principle purposes for the Greater London area:
  - Promoting economic development and wealth creation;
  - Promoting social development; and
  - Promoting the improvement of the environment.
- 5.15. The most relevant policies within this document are as follows.
- 5.16. **Policy SD1 Opportunity Areas** identifies the Site is within the Heathrow Opportunity Area which is allocated for 13,000 new homes and 11,000 new jobs.
- 5.17. **Policy D3 Optimising Site Capacity through the Design-led Approach-** states that all development must make the best use of land by following a design-led approach which optimises the capacity of site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth.
- 5.18. **Policy D4 Delivering Good Design** requires Design and Access Statements to demonstrate how the proposals meet the design requirements of the London Plan and sets out how design quality can be achieved and maintained.

- 5.19. **Policy D5 Inclusive Design** requires development proposals to take account of the principles of inclusive design while **Policy D7 Accessible Housing** requires at least 10% of dwellings to meet Building Regulations M4(3), and all others to meet M4(2).
- 5.20. **Policy D6 Housing Quality and Standards**- states that housing developments should be of high-quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purposes. Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.
- 5.21. **Policy D8 Public Realm** supports development that provides a safe, accessible, inclusive and well-connected public realm which is related to local and historic context.
- 5.22. **Policy H1 Increasing Housing Supply**- States that boroughs should optimise the potential for housing delivery on all suitable brownfield sites through their development plans and planning decisions, especially on sites within 800m of a station or town centre boundary on small sites. The policy sets a ten-year housing target for RBKC of 4,480 new homes.
- 5.23. **Policy H2 Small Sites**- States that boroughs should proactively support well designed new homes on small sites (below 0.25ha) in order to significantly increase the contribution of small sites to meeting London's housing needs. The policy outlines a ten-year housing target for RBKC of 1,290 new homes on small sites.

### LOCAL PLANNING POLICY

#### Local Plan Part 1 – Strategic Policies

- 5.24. The Local Plan: Part 1 – Strategic Policies is the key strategic planning document for Hillingdon. It sets out the long term vision and objectives for the Borough, what is going happen, where, and how this will be achieved. The key policies of relevance to the development proposals are provided below.
- 5.25. **Policy BE1: Built Environment** states the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long term-needs of all residents.
- 5.26. **Policy E2: Location of Employment Growth** states that the Council will accommodate 9,000 new jobs during the plan period. It is identified that most of this employment growth will be directed toward suitable sites in the Heathrow Opportunity Area. The Council note that they will promote development in highly accessible locations that delivers sustainable travel patterns and contributes to the improvement of existing networks to reduce emissions and impacts on air quality. In addition to this the Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.

- 5.27. **Policy E3: Strategy for Heathrow Opportunity Area** identifies that “the Council will prepare a Local Development Document (LDD) for the Heathrow area to achieve the future growth set out in Table 5.3, in consultation with the GLA and London Borough of Hounslow. This LDD will help manage development and protect land within the Heathrow Airport boundaries for airport-related activities. It will seek to ensure that local people benefit from sustainable economic growth located both within the Airport boundaries and in the Perimeter areas. The LDD will also set requirements for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality”.
- 5.28. **Policy EM1: Climate Change Adaptation and Mitigation** identifies that the Council will ensure that climate change mitigation is addressed at every stage of the development.
- 5.29. **Policy EM6: Flood Risk Management** outlines how the Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.
- 5.30. **Policy EM8: Land, Water, Air and Noise** requirements of relevance to the development proposals are provided below.

### Water Quality

*“The Council will seek to safeguard and improve all water quality, both ground and surface.*

### Air Quality

*“All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.*

*All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.”*

### Noise

*“The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.”*

### Land Contamination

*“The Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.”*

### Water Resources

*“The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day.”*

- 5.31. **Policy EM11: Sustainable Waste Management** outlines 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, ensuring that all waste is managed towards the upper end of the waste hierarchy”*.
- 5.32. **Policy T4: Heathrow Airport** details the importance of recognising the economic importance of the airport to the borough and how policies within the Local Plan will support the sustainable operation of Heathrow within the rest of its present boundaries and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.

### Local Plan Part 2: Development Management Policies

- 5.33. The Hillingdon Local Plan Part 2 – Development Management Policies was adopted in 2020 and aims to provide detailed policies that will form the basis of the LPA’s decisions on planning applications. Relevant policies are summarised below:
- 5.34. **Policy DMH2: Housing Mix** requires a mix of housing units of different sizes in residential development schemes to reflect the Council’s latest housing need.
- 5.35. **Policy DMH7: Affordable Housing** requires developments providing 10 or more residential units to provide a minimum of 35% affordable homes on site, split as 70% social/affordable rent and 30% intermediate. In exceptional circumstances, a financial contribution will be sought to provide off-site affordable housing.
- 5.36. **Policy DMHB11: Design of New Development** requires all new development to incorporate principles of good design, including harmonising with the local context through scale, plot size and building lines. The design should also use high quality materials, suitable internal layout and incorporate landscaping and greenery to enhance biodiversity. Amenity of neighbouring properties must also be retained.
- 5.37. **Policy DMHB12: Streets and Public Realm** states development should be well integrated with the surrounding area and accessible, taking opportunities to improve legibility, provide suitable landscaping treatment, and safe pedestrian and cycle movement.

- 5.38. **Policy DMHB14: Trees and Landscaping** states all developments are expected to retain or enhance existing trees and landscaping features, as well as provide a landscaping scheme which includes appropriate hard and soft landscaping proposals. A tree survey should also be provided where trees will be affected.
- 5.39. **Policy DMHB15: Planning for Safer Places** states the Council will require new development to be safe and secure through considering Secured by Design principles.
- 5.40. **Policy DMHB16: Housing Standards** states all proposed residential units should have adequate internal space which meets or exceeds standards. Major developments must also provide at least 10% wheelchair accessible housing.
- 5.41. **Policy DMHB18: Private Outdoor Amenity Space** requires all developments to have good quality and useable private outdoor amenity space in accordance with standards set out at Table 5.3. Balconies should be at least 1.5m in depth and 2m in width. Ground floor units should have 3m defensible space and boundary treatment must be in keeping with area character.
- 5.42. **Policy DMHB19: Play Space** states major developments which result in 10 or more children will be required to provide childrens' play facilities on site. Where this cannot be provided, a financial contribution will be sought.
- 5.43. **Policy DMEI1: Living Walls and Roofs** and on-site Vegetation states all major development should incorporate living roofs and/or walls.
- 5.44. **Policy DMEI2: Reducing Carbon Emissions** requires all development to make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan. Major developments must be accompanied by an Energy Assessment demonstrating how reductions will be achieved. **Policy DMEI3: Decentralised Energy** adds that all major developments must be able to connect to a DEN.
- 5.45. **Policy DMEI9: Management of Flood Risk** states developments which fail to make appropriate provision for flood risk mitigation will be refused. **Policy DMEI10: Water Management, Efficiency and Quality** requires all new build development applications to include a drainage assessment and strategy to include SuDS. They should also use water efficiency measures to provide water usage rates of no more than 105l/person/day, and demonstrate there is sufficient capacity in water and wastewater infrastructure network.
- 5.46. **Policy DMEI14: Air Quality** states proposals should be at least air quality neutral, include mitigation to ensure no unacceptable risk from air pollution and actively contribute towards improvement of air quality.
- 5.47. **Policy DMCI4: Open Spaces in New Development** supports major development proposals where they make provision for new open space or enhancements to existing open space which meet needs of occupiers of development and contributes to the mitigation of identified deficiencies in open space.
- 5.48. **Policy DMT5: Pedestrians and Cyclists** requires development proposals to ensure safe, direct and inclusive access is available for pedestrians and cyclists into new development.

- 5.49. **Policy DMT6: Vehicle Parking** requires development proposals to comply with the set parking standards within Appendix C. For residential flatted development, this is 1 car parking space per 1 or 2 bed units and 2 parking spaces per 3+ bed unit. Visitors parking should also be provided in addition. A Travel Plan should be submitted where the proposed development deviates from this.

### Supplementary Planning documents and guidance

- 5.50. A series of supplementary planning guidance (SPG) and supplementary planning documents (SPD) has been produced by the Council to provide greater detail on strategic policies to support decisions on planning applications.
- 5.51. The following documents have been taken into account:
- Accessible Hillingdon SPD – September 2017;
  - Noise SPD adopted 24 May 2006;
  - Air Quality SPG; and
  - Land Contamination SPG adopted January 2014.

## 6. Planning Considerations

6.1. This section of the Planning Statement assesses the application proposal against the planning policy framework for the site. Consideration is given to the principle of the proposed development and other planning issues arising from the development proposal including:

- Principle of Development;
- Housing Mix;
- **Accessibility Statement;**
- Density;
- Affordable Housing;
- Quality of Residential Accommodation;
- Design;
- Landscaping
- Neighbouring Amenity;
- Transport;
- Noise;
- Flood Risk and Drainage;
- Air Quality;
- Energy and Sustainability;
- Land Contamination;
- Fire Safety; and
- Planning Obligations.

### **Principle of Redevelopment**

#### Residential Development

6.2. The existing permission at the site is for a hotel, granted in April 2020 (application reference: 74423/APP/2018/4437). Since the granting of this permission, market conditions have changed significantly due to the global pandemic and a hotel is therefore no longer considered to be the most viable use of the land. Recent data published on 11 January 2023 by the Independent Newspaper has reported passenger numbers at Heathrow are still significantly lower than pre-pandemic levels, at 75% across the previous year when compared to 2019 numbers. Since the April 2020 hotel application was approved Heathrow Airport Limited have also confirmed that they currently do not intend on progressing with the previously proposed Heathrow Airport expansion. This provides further justification for not progressing with the previously approved hotel proposals.

- 6.3. The proposals are for residential development, which is considered to sit well within the surrounding context. The surrounding area is characterised by a mix of uses, including residential, hotels and commercial. As identified above, several planning applications for residential development via prior approval and full planning applications have been approved and implemented in the surrounding area since May 2014. This indicates an increase in residential uses in close proximity to the site. Whilst the majority of dwellings delivered in close proximity to the site have been in the form of change of use via permitted development rights, LBH have also approved intensification of such sites via full planning applications including at Building 2.
- 6.4. By virtue of the conversion of Building 2 to residential being completed, the lawful use of the site is now in residential use. Residential development of the car park site is therefore considered to represent an intensification of an existing residential site. The precedent of such intensification has been previously established at Building 2 through approval of a roof extension under application reference: 72408/APP/2018/972.
- 6.5. The site is not allocated or designated within the adopted 2020 Site Allocations and Designations, or the Policies Map documents. The adopted 2012 Local Plan: Strategic Policies identifies the site as a 'Proposed Area of Growth for Hotel and Office'. This designation has been superseded by the 2020 Local Plan: Development Management Policies, which confirms all sites along the Heathrow Perimeter have been removed from this designation, to ensure consistency with the Airports National Policy Statement. The release of the site from this allocation provides further justification in support of alternative uses on the site, including residential development.
- 6.6. The potential to deliver significant residential development on a sustainably located brownfield site is also a key consideration. The current 2021 London Plan sets a housing target for Hillingdon of 10,830 new homes across the 10 year plan period. This represents a significant uplift from the 5,593 new home target provided within the previous 2016 London Plan, which is a 106% uplift. Such increased targets have resulted in increased pressure to optimise the potential of existing sites such as Status Park. As identified within the London Plan 2021, the site is within the Heathrow Opportunity Area which outlines an indicative capacity for 13,000 new homes and 11,000 new jobs.
- 6.7. It is noted an Article 4 Direction preventing the change of use from office to residential use came into force in November 2017, following the granting of prior approval of all applications identified in Section 3. The Article 4 Direction aims to protect strategic employment floorspace, including all existing employment sites along the Heathrow Perimeter. This is considered to protect existing employment uses rather than preventing the introduction of other uses at the site.

### Reconfiguration of Car Parks and Provision of Public Open Space

- 6.8. At pre application stage, the Applicant sought to provide car parking for the proposals in accordance with the Council's car parking standard provided in Local Plan Appendix C. The LPA, however, raised the complex car parking history for the Site, as well as the lack of public open space, given the Site formerly comprised office blocks. Officers stated that subject to detailed assessment including a parking survey, a

reduction in car parking to allow for an increase in public open space within Status Park would be a preferable approach to a future application.

- 6.9. The LPA therefore advised the approach that the application should seek should be to rationalise the car parking across all buildings within Status Park, including the proposed building, to bring the parking ratio level down to circa 0.6 (**Appendix 1**). It was advised a holistic approach would deliver a better quality development for future residents, as well as allow for the delivery of public open space within the site to improve residential amenity.
- 6.10. As a result, the application proposes the reconfiguration of car parking within the Site, and the provision of additional landscaped public open space. The details and quantum of proposed car parking and the proposed public open space are each assessed on their own merits within relevant sections below.

### Housing Mix

- 6.11. Policy DMH2 requires provision of a mix of housing units of different sizes. The Policy does not set out a housing mix requirement, but encourages the provision of 3-bedroom properties and requests that developers reflect the Council's latest information on housing need within proposals. In addition, London Plan Policy H10 provides further guidance on housing mix, and states that an appropriate unit mix should be based on a number of factors including the nature and location of the site, the aim to optimise housing potential and the ability of new development to reduce pressure on conversion and subdivision of existing stock. At pre application stage, it was advised that as a broad rule of thumb, 25% of proposed units should be for 3+ bedroom units (**Appendix 1**). The proposed housing mix is set out below:

Unit Size	No. Proposed	Percentage of Units
1-bedroom	27	40%
2-bedroom	23	34%
3-bedroom	17	25%

- 6.12. The proposed housing mix is therefore considered to accord with LBH requirements, providing a fairly even mix of unit sizes, with priority given to smaller units given the Site's location in close proximity to Heathrow Airport and its flatted nature, both of which are likely to make the Site less preferable for larger families.

### Accessibility Statement

- 6.13. Policy DMBH16 requires that 10% of new housing is accessible or easily adaptable to wheelchair users (M4(3)). The proposals offer 7 wheelchair compatible units, equating to 10.44% of units. This is therefore in compliance with Policy.

### Density

- 6.14. The supporting text to Policy GG2 of the London Plan outlines that London is anticipated to experience very high levels of continued growth which will require more efficient use of land, to allow growth whilst

protecting the Green Belt. As such, to get more out of limited land availability within the city, encouraging higher densities and a mix of uses in appropriate locations is required. Encouraging higher densities in appropriate locations means more people are within walking distance of local amenities and transport connections, which in turn reduces the need for private car ownership and supports the transition to a more sustainable city.

- 6.15. In addition, Policy D1 (London's form, character and capacity for growth) and Policy D2 (Infrastructure requirements for sustainable densities) of the London Plan both require proposals to have regard to the context of the surrounding area, including existing and proposed levels of infrastructure. Policy D2 further states that proposed densities should be proportionate to the site's connectivity and accessibility by sustainable travel modes. Furthermore, Policy D3 of the London Plan seeks to optimise site capacity through a design-led approach to density.
- 6.16. With regards to the Local Plan, Policy DMHB17 provides a residential matrix. While this is considered to have been superseded by the London Plan's design-led approach, the proposals can be compared against the density parameters set out within the Policy. The Policy states an appropriate starting point for assessing appropriate densities for residential areas outside of town centres would be 50-100 units per hectare (u/ha) for mostly flatted developments. Assuming a site area of approx. 0.5 hectares, for 67 flats, this would result in a scheme with a density of 134 u/ha. While this is slightly above the recommended density guidelines for this location, Policy DMHB17 sets out that this will be applied in a flexible manner. As per the London Plan, development should ultimately follow the design-led approach and the proposals are considered to optimise the site capacity.

### Affordable Housing

- 6.17. LBH Policy DMH7 requires new development proposals of 10 or more residential units to provide 35% on site affordable housing, subject to viability, with a tenure split of 70% social affordable rent and 30% intermediate.
- 6.18. A Financial Viability Assessment is under preparation and will be submitted alongside the planning application. The proposals will seek to maximise affordable housing provision on site, subject to viability.

### Quality of Residential Accommodation

#### Amenity Space

- 6.19. It is noted Policy DMHB18 outlines that all residential development requires good quality, useable private outdoor amenity space, at a minimum of the following for flats:
  - 1-bedroom: 20sqm
  - 2-bedroom: 25sqm
  - 3+ bedrooms: 30sqm

- 6.20. Balconies should be a minimum of 1.5 metres in depth and 2 metres in width.
- 6.21. It is highlighted that the London Plan provides significantly different requirements for private amenity space, stating a minimum of 5sqm should be provided for 1-2 person 1-bed units, with an additional 1sqm per additional occupant. 100% of proposed units meet the London Plan requirements and 10% of units (all ground floor units) meet the LBH requirements. The shortfall against LBH requirements is justified through the significant amount of proposed public amenity space within the Site which will provide high quality green open space for future occupants, as well as children's playspace on their doorstep. This is outlined further under Landscaping below. Additionally, provision of such high levels of amenity space within a flatted development is difficult to achieve and would result in significantly fewer residential flats. Since the proposals meet the requirements as set out in the London Plan, they are considered to accord with Policy.
- 6.22. Another consideration when designing the private amenity space is that the Site is located in close proximity to Heathrow Airport, where there are high levels of noise pollution. As such, it is considered that south-facing balconies would not be considered 'good quality' or 'useable' at all times given they face towards Heathrow Airport which generates significant noise and air pollution. As per the GLA Housing Design Quality and Standards SPG, ventilated winter gardens may be proposed as a form of outdoor space where residential dwellings will be exposed to high levels of noise or air pollution. As such, winter gardens are proposed within this scheme to south and south-east facing private amenity spaces. They are thermally separated from the interior and comprise a drainable floor, in accordance with GLA guidance. It is therefore considered that the winter gardens proposed provide suitable private external amenity space for occupants.
- 6.23. The proposed residential units within the 'east-west leg' of the proposals also benefit from balconies. While they are north-facing, they are sheltered from noise pollution from Heathrow Airport and as such can be enjoyed by future occupants alongside winter gardens.
- 6.24. The proposed ground floor units each have private gardens which offer significant amount of private amenity space (between 29-106sqm per unit) which significantly exceeds LBH requirements. The gardens will be buffered with landscaping to provide good levels of amenity in terms of noise and privacy. They have been provided as south facing for the majority of units to maximise levels of sunlight.
- 6.25. As such, the proposals are considered to have maximised external amenity space on site to contribute to a high quality development.

### Internal Standards

- 6.26. Policy DMHB16 requires that all proposed residential units meet or exceed the minimum national space standards. As outlined within the Design Statement, all units are in accordance with this requirement.
- 6.27. Policy D6 of the London Plan states developments should maximise the provision of dual aspect dwellings and avoid the provision of single aspect units except in cases where it is a more appropriate design solution. The development comprises 90% dual aspect units (including one triple aspect unit). There are two single aspect units (Units 2 and 3) at ground floor level and five at upper floors (Unit 10). Units 2 and

3 are located on the ground floor 'north-south wing' of the development. They are single aspect given the cycle store, bin store and plant need to be located on the ground floor of the development, and have been located to be south-east facing in order to maximise internal light levels. Due to the single aspect configuration of these dwellings private external amenity space has been maximised for these dwellings. 50sqm (Unit 2 – 1b/2p) and 70sqm (Unit 3 – 2b/3p) of private external amenity space is provided, which significantly exceeds the standards set out within the Local Plan. As such, this considered to be an acceptable compromise for providing single aspect dwellings. With regards to Unit 10, this is a 1-bed unit which comprises three south facing windows and winter garden to maximise internal light levels.

- 6.28. An internal daylight / sunlight assessment has been carried out for all proposed residential units. The assessment uses the Target Daylight Factor to determine natural internal luminance, and confirms that all proposed rooms within each proposed unit significantly exceed the Target Daylight Factor, demonstrating future occupants will enjoy well-lit environments. As such, the proposals are considered to provide good levels of internal light, including the single aspect units.

### Design

- 6.29. Detailed assessment and consideration of the design is provided within the Design and Access Statement that accompanies this application.
- 6.30. The new building will create a new identity for the site, optimising its potential whilst recognising the constraints posed by its context and its proximity to Heathrow Airport.
- 6.31. Local Planning Policy reinforces the requirement for proposals to achieve a high standard of design and for layouts to respect the local context as well as being compatible with the immediate surroundings. As required under Policy BE35 this is particularly important due to the sites location along a major road. The changing character of Status Park from commercial to residential was also discussed at pre application, and Officers asked that the building design reflected this new area character.
- 6.32. As such, the proposals are designed so that they are sympathetic to the design and appearance of their surroundings and so that the site sits comfortably within the street scene on Bath Road. The intended massing will create a strong corner site, emphasising the entrance to the built up area to the south of Harlington which is characterised by mixed uses.
- 6.33. The general palette of materials proposed have been carefully selected in order to deliver a high quality scheme. The visual appearance of the elevations are considered appropriate when compared with other buildings in the immediate proximity. Brick will be the principal external material as it is the predominant building material in the immediate proximity of the site, is robust, requires low maintenance and acts as an effective acoustic barrier. In this regard, the proposed use and design conforms with the principle concerns of policies BE1 and DMHB11.
- 6.34. At 6 storeys in height the proposed residential building is the same height as a number of buildings within the locality including the IBIS Hotel, approximately 50m to the west of the site. This building acts as a precedent as to what is likely to be considered as acceptable on site. On this basis the proposals are not

considered to adversely affect the surrounding local character as required under Policy BE1 and DMHB11.

- 6.35. For the reasons set out above it is considered that the design relates architecturally to the surrounding area and its height and general elevational proportions are in keeping.

### **Landscaping**

- 6.17. In accordance with local policy, the development proposals have provided a Landscape Scheme, prepared by BD Landscape Architects, that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity in an area deficient in green infrastructure.
- 6.36. The landscaping strategy includes grassed amenity space for future occupants to use in addition to private external amenity space. It can also be utilised by occupants of other existing buildings within Status Park, given the lack of existing amenity space within the local area. The existing car parks within the Site have been reconfigured to allow for additional landscaping across the Site, including planting, hedging, trees and SuDS features. This helps to break up the hardstanding and provide a more pleasant, green and visually enhanced environment for existing and future occupants of Status Park.
- 6.37. Policy BE38 seeks the retention of topographical and landscape features of merit and provision of new planting and landscaping. In accordance with Policy BE38 and DMHB14. The development proposal maximise retention of hard and soft landscaping appropriate to the character of the area.

### Children's Playspace

- 6.38. Policy S4 of the London Plan sets out that development proposals for schemes likely to be used by children should include playspace, with at least 10sqm per child. The GLA Playspace calculator indicates c. 20.8 children are likely to be generated by the proposed development and as such recommends a total of 208sqm playspace on Site.
- 6.39. A play strategy has been developed as part of the Landscape Scheme, and proposes to provide two play areas for different age groups of 1-12 and 13-17. The playspaces will be located immediately north of the proposed building, where they will be well overlooked by the proposed building and easy to access. It is considered that full details will be secured via planning condition.

### Trees

- 6.40. Of the 26 trees surveyed on site there are no Category A trees, only seven Category B trees and none of the trees have tree preservation orders applied to them. Although some trees are required to be removed as part of a forthcoming application no Category A or Category B trees are to be removed. 16 trees are required to be removed in order to implement the proposals, however, to justify this 49 trees are proposed to be planted representing a net uplift of trees on site. As a result there is no net loss in the quality of the tree setting on site in accordance with DMHB14 of the Local Plan.
- 6.41. No fruit yielding trees are proposed so not to encourage birds into the area which may conflict with airport operations, following advice obtained from Heathrow Airport Operation Facility as part of the previous

planning application.

### Urban Greening Factor

- 6.42. Policy G5 of the London Plan states major proposals should contribute to the urban greening of London through incorporating it as a fundamental element of design. Through this, an Urban Greening Factor (UGF) score can be reached. It is recommended that a score of 0.4 is reached for predominantly residential developments.
- 6.43. The Landscape Statement submitted alongside this application calculates the UGF score of the proposals, taking into account the amount of and quality of greening that have been implemented into the design and the overall size of the Site. The UGF is calculated as 0.24. While it is recognised this is below the target score of 0.4, it is highlighted that UGF is calculated taking into account site area. Given the southern part of the Site is the only part being entirely redeveloped, while the northern parts of the Site are subject to reconfiguration, the amount of greenery that can be implemented within the northern part is limited.
- 6.44. The Landscaping Masterplan makes it clear greening has been maximised as much as possible within all parts of the Site, through intensive green roof atop the proposed building, tree planting, flower-rich planting and sustainable drainage elements. A significant portion of the proposed Site is also used for amenity grassland which has a low UGF score, but will significantly benefit current and future users of the Site. As such, the proposals are considered to have maximised urban greening across the Site in accordance with Policy G5.

### **Neighbouring Amenity**

- 6.45. The perpendicular positioning of the proposed building to the existing residential building will reduce overlooking, and maximise levels of daylight / sunlight into both buildings and will assist in providing privacy for adjacent occupiers. Likewise, the proposal will be sympathetic to adjacent businesses in terms of lighting and noise emissions as required under Policy DME5.
- 6.46. In order to assess the impact in terms of loss of daylight / sunlight a Daylight and Sunlight Assessment has been prepared by T16 Design. This report uses industry standard methodology, numerical analyses to ascertain the effects of the development and the levels of change in daylight and sunlight for the neighbouring properties to the proposed residential building.
- 6.47. The main criteria used in this analysis to show compliance are the Annual Probable Sunlight Hours and Vertical Sky component tests. The Daylight / Sunlight report demonstrates that all of the notional windows assessed retain a VSC of greater than 27% or at least 80% of their current values, and so the scheme is compliant with BRE guidance for daylight.
- 6.48. In terms of sunlight, all assessed windows meet the BRE Guidance by virtue of retaining 25% of annual and 5% of winter sunlight hours.

- 6.49. The proposed scheme is therefore acceptable in daylight and sunlight terms and meet the requirements of Policy BE20 which requires the amenity of existing / neighbouring dwellings to be protected.

### Transport

- 6.50. A Transport Assessment and a Travel Plan have been prepared by Mayer Brown. Section 2 of the assessment confirms that the PTAL value for the site is 3, which is classified as 'moderate' accessibility. The site is within a 5 - 6 minute walk of PTAL zone 5 (at the bus stops on Bath Road adjacent to the Holiday Inn). This is demonstrated through the existing lack of car use.
- 6.51. The proposals are expected to generate 51 two-way person trips in the weekday AM peak hour (08:00-09:00) and 36 two-way person trips in the weekday PM hour (17:00-18:00). In the AM peak, 14 of these will be vehicle trips and in the PM peak, 12 will be vehicle trips. A total of 110 two-way vehicle trips are expected daily.
- 6.52. When compared to the extant consent use for the site as a hotel, the development proposals would result in an estimated net reduction of 9 two-way vehicle trips during the traditional weekday AM peak hour, a reduction of 2 two-way vehicle trips during the traditional weekday PM peak hour and a reduction of 86 two-way vehicle trips over the course of a typical day.
- 6.53. The development proposals would subsequently not result in a material impact upon the local highway network when compared to the extant consent use in accordance with Policy DMT2 of the Local Plan.
- 6.54. A revised access to the Site, including the addition of further pedestrian entrance points via the northern approach to the building to improve accessibility in accordance with Policy DMT5.

### Car and Cycle Parking

- 6.55. The London Plan indicates maximum vehicle parking standards for sites with a PTAL of 2/3 in outer London include up to 0.75 spaces per 1-2 bed units and up to 1 space per 3+ bed units. It was identified through a car parking demand survey that there is an existing surplus of car parking at Status Park, likely due to its change in character from a business park to a predominantly residential neighbourhood via the change of use of Buildings 2, 3 and 4 from offices to residential flats. As such, it was recommended by Officers at pre application (Appendix 1) that car parking across the Site is reduced to an appropriate quantum of 0.6 spaces per unit.
- 6.56. The proposals therefore reduce the existing 245 parking spaces associated with car parks 1 to 4 to 149 spaces, a reduction of 95 parking spaces (39%) within the wider site. A total of 11 parking spaces would be provided within a parking court immediately to the north of the main building within the application red line site. Of the 11 spaces, 4 no. would be designed as blue badge parking spaces and 4 no. would be equipped with electric vehicle (EV) charging points. The remaining 7 no. spaces would be provided with passive EV provision.
- 6.57. Vehicle swept path analysis for a large car has been undertaken and demonstrates the suitability of the proposed car park layout.

- 6.58. The proposed development would provide a total of 121 no. long stay cycle parking spaces in accordance with London Plan 2021 standards. A total of 108 long stay spaces would be provided within three dedicated internal cycle stores within the ground floor level of the residential building. A further 14 no. cycle parking spaces in the form of 7 secure, sheltered and lockable Sheffield stands would be provided within a separate cycle parking area adjacent to the building.
- 6.59. A further four short-stay cycle parking spaces in the form of 2 no. Sheffield cycle stands would be provided within the external cycle parking area.
- 6.60. As such the proposed cycle parking is considered to accord with Policy T5 of the London Plan and guidance within LBH DMP. The proposed car parking provision sits below the maximum standards set out within the London Plan Policy T6.1 and is therefore in accordance.

### Delivery and Servicing

- 6.61. It is proposed that deliveries and waste collection will be undertaken from the bin store collection points located by the car park entrance to the proposed building. Bins would be transported to the collection points on waste collection days by the Facilities Manager of the development block. Internal bins stores for both recycling and general waste would be provided at ground floor.

### **Noise**

- 6.62. A Environmental Noise Survey and Acoustic Design Statement has been prepared by Hann Tucker Associates in order to assess the suitability of the site for providing a residential use.
- 6.63. This report demonstrates that appropriate target internal noise levels are proposed and that they are achievable using conventional mitigation measures. Mitigation advice, including the use of suitability specified glazing and acoustically attenuated ventilation, has been recommended to reduce the adverse impact from environmental noise to a minimum.
- 6.64. The assessment shows the site, subject to appropriate mitigation measures, is suitable for residential development in terms of noise and that the requirements of Policy EM8 are met.

### **Air Quality**

- 6.65. An Air Quality Assessment has been undertaken by Air Quality Assessments Ltd. Their report describes the existing air quality conditions in proximity to the site and considers the effect of the development on local air quality and of existing air quality on new receptors at the development.
- 6.66. The report demonstrates how the construction phase will have the potential to create dust, meaning it will be necessary to implement mitigation measures to minimise dust emission. Once implemented, any residual effects will be insignificant.

- 6.67. The impacts on air quality at the Site due to emissions from the local road network are shown to be acceptable, with predicted concentrations being below the air quality objectives.
- 6.68. The operational air quality impacts on the development are judged to be insignificant, taking account of the conclusion that no residents of the proposed development will be exposed to exceedances of the objectives.
- 6.69. The report concludes that the development will be air quality neutral with regards to transport and building emissions and that it will accord with the relevant policies within the Development Plan.

### Flood Risk and Drainage

- 6.70. A Flood Risk and Drainage Strategy has been prepared by EAS to support the proposals. The report confirms the Site is located within Flood Zone 1 with a 'Low' susceptibility to surface water flooding. Even so, a Surface Water Drainage Strategy has been prepared in accordance with LBH Policy which requires surface water drainage to be managed via SuDS which take into account surface run-off quantity and rates. The Flood Risk and Drainage Strategy should be referred to for full details.

### Land Contamination

- 6.71. Phlorum has undertaken a Phase 1 Preliminary Risk Assessment, land contamination desk study assessment of the proposed development.
- 6.72. This report demonstrates that the potential risk to the current or proposed future users of the site from any off-site contamination sources, either current or historical, are considered to be Very Low to Moderate. The main potential contamination source is from the Site's current use as a car park, however there was no observed evidence of contamination from this source.
- 6.73. It is considered that a Phase 2 and a Phase 3 report could be secured via planning condition, if considered necessary by LBH Officers.

### Energy and Sustainability

- 6.74. An Energy Statement has been prepared by T16 Design and submitted in support of this application. The report assesses the predicted energy performance and carbon dioxide emissions of the Proposed Development in the context of local and London-wide policy requirements and best practice methods. The methodology used to demonstrate the effects of the proposed energy efficiency measure sis the four stage Energy Hierarchy outlined within London Plan Policy SI2.
- 6.75. The report shows that at the "Be Lean" stage, an energy efficient design and building fabric will reduce energy demand. In terms of the "Be Clean" stage, the Site is not near any existing or proposed decentralised energy networks, or heating networks. Due to the relatively small scale of the proposal, CHP is not a viable solution. At the "Be Green" stage, air source heat pumps and PV panels have been identified as a suitable renewable energy source. Therefore, through the implementation of the energy hierarchy,

the overall strategy is expected to achieve a site-wide 74% reduction in CO2 emissions when compared to Building Regulations Part L 2021.

- 6.76. The energy strategy therefore demonstrates that the Proposed Development is capable of meeting and significantly exceeding London Plan Policy SI2 requirements.
- 6.77. The Sustainability Report takes an overarching look at the sustainable features proposed for the scheme and how these measures will reduce its environmental impact in line with the policy requirements of the Local Authority and the London Plan. The measures to be included within the design include reductions in potable water use, resource efficiency and increased biodiversity within the build and occupation stages of development.

### Fire Safety

- 6.78. London Plan Policy D12 states that "*in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety*". It goes on to provide a set of criteria that must be satisfied in order to ensure this and outlines that a Fire Statement must be submitted as part of planning applications for major development proposals to demonstrate compliance and provide details on how the development proposals will function in accordance with a further set of requirements.
- 6.79. A Fire Statement, prepared by Accendo, has been submitted as part of this full planning application. This provides details on the design and materiality of the building, and how it has been designed in accordance with Building Regulations. This confirms that the building and its layout has been designed to ensure that the Proposed Development will ensure the safety of all future residents and users in accordance with Policy D12.

### Planning Obligations

- 6.80. The Community Infrastructure Levy (CIL) Charging Schedule for Hillingdon came into effect on 10 July 2014. In accordance with the relevant regulations, in the event that planning permission is granted then the applicant is aware that they would be liable to pay CIL upon implementation of that permission.
- 6.81. In addition to this the Applicant is mindful that there may be other planning obligations in line with the Council's Section 106 SPD.

## 7. Conclusion

- 7.1. This Town Planning Statement has been prepared on behalf of MBH Heathrow Ltd to support a full planning application for development at Status Park. The application proposes the construction of a 6 storey building comprising 67 residential units within the existing car park, along with reconfigured car park and provision of landscaping.
- 7.2. The principle for a residential development on the site is considered to be acceptable in principle based on the nature of Status Park as a site with predominantly residential uses, which is no longer allocated as a 'Proposed Area of Growth for Hotel and Office'. The Site sits within the Heathrow Opportunity Area which is identified for 13,000 new homes.
- 7.3. The application proposals optimise the potential of a brownfield site in a sustainable location and deliver a high quality residential scheme which will contribute to LBH's target to deliver 10,830 new homes across the 10 year London Plan period.
- 7.4. It has been demonstrated that the proposals are acceptable with regard to:
- Housing mix and density, including accessible and affordable housing;
  - Quality of residential accommodation;
  - Impact on neighbouring amenity;
  - Car parking capacity for the proposed building and adjacent residential developments;
  - Would not have a detrimental impact to highway safety and highway capacity;
  - That through appropriate noise mitigation measures that the site is a suitable for residential development;
  - That the proposal is air quality neutral;
  - That the most appropriate means of surface water drainage is proposed in accordance with the drainage hierarchy;
  - Risk from contamination sources on site are low;
  - The energy strategy proposed complies with London Plan standards; and
  - The development has been designed to be fire safety compliant.
- 7.5. Overall the redevelopment of the site provides the opportunity to introduce a new residential development that reflects the character, landscape and land uses of its immediate context while responding to local and national policies.
- 7.6. The proposal has been assessed against the planning policy context and has been found to be in accordance with National and Local planning policies and guidance. The presumption in favour of sustainable development set out in the NPPF therefore applies and planning permission should therefore be granted.

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## **Appendix 1**

### **Pre Application Response**

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Chris Brady  
33 Margaret Street  
London  
W1G 0JD

Planning Applications Team  
Hillingdon Council  
Civic Centre, High Street  
Uxbridge UB8 1UW  
  
Tel: 01895 250230  
Case Officer: Andrew Thornley  
Email: [athornley@hillingdon.gov.uk](mailto:athornley@hillingdon.gov.uk)  
Date: 7th October 2022  
Our Ref: 74423/PRC/2022/165

Dear Chris Brady

**RE:** Redevelopment of existing car park to provide 7 storey building comprising 69 residential units including car parking and associated landscaping.

**SITE:** Land At Status Park Nobel Drive Harlington

I refer to your request for pre-application planning advice dated 11th August 2022 and our subsequent meeting on the 9th September 2022 relating to the above development. Attending on behalf of the local planning authority was Andrew Thornley (Principal Planning Officer), Mandip Malhotra (Planning Manager), Mark Butler (Principal Urban Design Officer) and Alan Tilly (Transport Team Manager).

This letter will discuss the main planning issues including the principle of a residential development in this location, along with general design considerations, transport implications, impacts on neighbours and the quality of accommodation.

Plan Numbers:

Cover Letter (12-07-22) - received 27 Jul 2022

Design Statement (February 2022) - received 27 Jul 2022

E21-038/PSP000 - received 27 Jul 2022

E21-038/PRP000 - received 27 Jul 2022

E21-038/PRP001 - received 27 Jul 2022

E21-038/PRP002 - received 27 Jul 2022

E21-038/PRP003 - received 27 Jul 2022

E21-038/PRP004 - received 27 Jul 2022

E21-038/PRP005 - received 27 Jul 2022

E21-038/PRP006 - received 27 Jul 2022

E21-038/ELE001 - received 27 Jul 2022

E21-038/ELE002 - received 27 Jul 2022

E21-038/ELE003 - received 27 Jul 2022

E21-038/ELE004 - received 27 Jul 2022

**Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.**

### **The Site and Surrounds**

The application site forms part of the wider former business park, known as Status Park, which has been largely converted from office uses to either residential or hotel uses. Examples of this include Atlantico House (formerly Building 3), converted to residential uses (Ref: 69183/APP/2017/1363, approved on 14-06-17) and Peninsula House (formerly Building 4), also converted to residential uses (Ref: 46616/APP/2017/1362, approved on 15-06-17). Further to the north-west are Circa Apartments, also in residential use, and beyond this are the Ibis Hotel and Airport Bowl (a bowling centre), alongside houses on Nobel Drive. To the east of the application site, and to the north of Nobel Drive, is an area of Green Belt which extends northwards to the M4, which appears to mostly be farmland with some areas of public open space, whilst to the south is Bath Road (the A4), a heavily used dual carriageway.

The application site itself consists of the car park for the residential complex to the west (now known as Vista Court, formerly Building 2), a former office building converted into 46 flats under the prior approval process (Ref: 72408/APP/2017/3021, approved on 27-10-17). This permission appears to have been implemented, and Condition 1 of this permission requires 69 car parking spaces (including 7 wheelchair accessible spaces, 14 active and 14 passive electric vehicle charging points) alongside 3 motorcycle parking spaces, 48 cycle spaces and the bin store to be provided within the area proposed to be built on. It is also noted that Conditions 2 (Parking Allocation Plan), 3 (Refuse and Recycling Enclosures), 4 (Landfill Gas Survey), and 5 (Noise Mitigation Measures) all required details to be submitted and approved by the council prior to occupation, however only Condition 4 has had details approved. A later application to extend the converted building upwards by a storey for 8 additional units was approved, but never implemented (Ref: 72408/APP/2018/972, approved on 07-06-18).

Also of relevance, a previous application across the current application site was approved under reference 74423/APP/2018/4437 on 15-04-20 for a six-storey, 140-bedroom hotel, which also rationalised parking across the wider Status Park to secure 1 parking space for each new unit within Buildings 2, 3 and 4 (now Vista Court, Atlantico House and Peninsula House respectively) together with 28 hotel parking and 11 visitor parking spaces. This permission has not been implemented however is still extant (subject to conditions and obligations being discharged) until April 2023.

It should be further noted that application reference 72408/APP/2021/1487, dated 26-07-21, amended the parking layout and provision for the new residential blocks within Status Park, securing 35 car parking spaces for Vista Court, 27 spaces for Atlantico House and 36 spaces for Peninsula House (a total of 98 residential car parking spaces), which would not have affected the approved parking layout for the hotel, but if implemented, would prevent the lawful implementation of the hotel permission because an obligation secures 185 parking spaces across Status Park.

### **The Proposal**

The proposed development is a seven-storey, 'L' shaped block of flats occupying the same footprint as the

consented permission for a hotel, but with an additional storey, partially set back. The proposal would comprise of 69 flats and provide 53 car parking spaces (although 9 (18) of these would be provided as double spaces for use by a single household). The building would be finished in grey buff brickwork up to the sixth floor and would use grey anthracite metal cladding for the top floor.

## Planning Policy

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon consists of the following documents:

The Local Plan: Part 1 - Strategic Policies (2012)  
The Local Plan: Part 2 - Development Management Policies (2020)  
The Local Plan: Part 2 - Site Allocations and Designations (2020)  
The London Plan (2021)  
The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2021), Planning Practice Guidance, as well as relevant supplementary planning documents and guidance are all material consideration in planning decisions.

The proposed development has been assessed against development plan policies and relevant material considerations.

Part 1 Policies:

PT1.BE1 (2012) Built Environment  
PT1.EM1 (2012) Climate Change Adaptation and Mitigation  
PT1.EM11 (2012) Sustainable Waste Management  
PT1.EM6 (2012) Flood Risk Management  
PT1.EM7 (2012) Biodiversity and Geological Conservation  
PT1.EM8 (2012) Land, Water, Air and Noise  
PT1.H1 (2012) Housing Growth  
PT1.H2 (2012) Affordable Housing

Other Policies:

DMAV 1 Safe Operation of Airports  
DMAV 2 Heathrow Airport  
DMCI 4 Open Spaces in New Development  
DMCI 5 Childrens Play Area  
DMCI 7 Planning Obligations and Community Infrastructure Levy  
DMEI 10 Water Management, Efficiency and Quality  
DMEI 12 Development of Land Affected by Contamination  
DMEI 14 Air Quality  
DMEI 2 Reducing Carbon Emissions  
DMEI 7 Biodiversity Protection and Enhancement  
DMEI 9 Management of Flood Risk

DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D2	(2021) Infrastructure requirements for sustainable densities
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D9	(2021) Tall buildings
LPP G2	(2021) London's Green Belt
LPP G4	(2021) Open space
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP GG2	(2021) Making the best use of land
LPP GG3	(2021) Creating a healthy city
LPP GG4	(2021) Delivering the homes Londoners needs
LPP H1	(2021) Increasing housing supply
LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure
LPP H7	(2021) Monitoring of affordable housing
LPP HC1	(2021) Heritage conservation and growth
LPP S4	(2021) Play and informal recreation
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions

LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
LPP T8	(2021) Aviation

## Main Planning Issues

### 1. Principle of development

#### PROPOSED RESIDENTIAL USES

Paragraph 119 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Policy GG2 of the London Plan (Making the best use of land) incorporates this requirement and states that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, particularly on sites within and on the edge of town centres. Sites which are well connected by existing or planned public transport should be prioritised, and options to intensify the use of land in well-connected areas to support additional homes and workspaces should be explored, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. This should align with Policy D3 of the London Plan by applying a design-led approach to determine the optimum development capacity of a site.

Moreover, Policy GG4 (Delivering the homes Londoners need) sets out that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered, must support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable and must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

Policy H1 of the London Plan (Increasing housing supply) sets the 10-year housing targets for each London borough, and this places a 10-year housing completions target for the London Borough of Hillingdon of 10,830 homes (starting in 2019/20 and continuing through to 2028/29). This equates to an average completion target of 1,083 homes a year, although Policy H1 makes clear that some variations in yearly targets will be acceptable as long as the overall delivery strategy for new homes is not compromised.

Policy H1 of the London Plan further sets out boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially for sites with existing or planned public transport access levels (PTALs) of 3-6, or sites which are located within 800m of a station or

town centre boundary. PTALs are determined by a range of factors affecting accessibility to public transport, and are scored from 0-6b, where 0 is the worst and 6b is the best.

The proposed development seeks to intensify the use of a brownfield site by re-developing a car park associated with Vista Court, which comprises of 46 flats, and was formerly used as an office (known as Building 2). The site has a PTAL of 3, with Hayes and Harlington Train Station, Heathrow Terminals 2 and 3 Underground Station, and Hatton Cross Underground Station all within 15 minutes' bus journey (from the bus stops on Bath Road), and is within 800 metres of Harlington Local Centre. It is further recognised that the previous permission (Ref: 72408/APP/2017/3021) establishes that the site has development potential, albeit the previous permission was for a hotel use.

Additionally, the surrounding area includes a mix of uses, with residential uses surrounding the site, alongside a general concentration of hotels along Bath Road, although this is not reflected in the appearance of the area which retains a very commercial character as a result of the original uses of Buildings 2, 3 and 4 (as offices). The southern side of Bath Road in this area has an even more commercial character, despite the presence of some isolated houses, with the uses largely relating to long-stay car parking and places to rent cars, which, unsurprisingly, results in a very car-dominated environment.

Nonetheless, recognising that the character of Bath Road is evolving to include less non-residential uses and introduce new places for people to live, which is reflected in the removal of Bath Road as an area appropriate for hotels through the Local Plan Part 2, it is considered that the proposed residential uses would be appropriate in this location, making good use of a relatively accessible site and making a fairly significant contribution to the supply of new homes within the borough. The acceptability of the residential development will, however, depend on whether parking for the occupiers of Vista Court has been satisfactorily resolved and whether a policy compliant level of affordable housing will be provided, both discussed in greater detail below.

## AFFORDABLE HOUSING AND UNIT MIX

Policy H4 of the London Plan (Delivering affordable housing) sets the strategic target of 50% of all new homes delivered across London to be genuinely affordable. As such, all major developments (10 units or more) trigger affordable housing requirements and should provide affordable housing through the threshold approach (discussed below). Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

Additionally, Policy H5 of the London Plan (Threshold approach to applications) sets out that to follow the Fast Track Route of the threshold approach, meaning the applicant is not required to submit a financial viability assessment (FVA) to support their application, development proposals must meet or exceed the relevant threshold level of affordable housing on site without public subsidy, be consistent with the relevant tenure split, and meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant. Where an application does not meet the above requirements, it must follow the Viability Tested Route, which requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application to ascertain the maximum level of affordable housing deliverable on a scheme. The assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG, for which the local planning authority would use an external consultee, paid for by the applicant, to carry out the review and provide advice. What this means in practice is that an FVA must follow the EUV+ approach to calculating the benchmark land value and adopt sensible profit targets, market values and build costs, as any protracted discussions on viability will inevitably slow down the planning process and lead to delays in determination.

Furthermore, Policy H6 of the London Plan (Affordable housing tenure) states that affordable housing products within a development should include a minimum of 30% low-cost rented homes (including

London Affordable Rent or Social Rent), a minimum of 30% intermediate products which meet the definition of genuinely affordable housing (including London Living Rent and London Shared Ownership), with the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products, based on identified need, with a presumption that the 40% to be decided by the borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London.

Having regard to the evidence base, and the need to encourage development whilst maximising affordable housing provision, the supporting text to Policy H2 sets out that at least 35% of all new dwellings should be delivered as affordable housing, with an indicative tenure split of 70% low-cost rent and 30% as intermediate housing, although it is recognised that market conditions in Hillingdon are complex and a one size fits all approach to tenure provision will not be suitable for all areas in the borough. Noting the strategic demand for 50% of all new housing to be affordable, established by both the Hillingdon Local Plan Part 1 and the London Plan, 35% affordable housing provision would not trigger the need for an FVA to be submitted but would still be below the strategic target.

Regarding the mix and size of units within a development, Policy H10 of the London Plan (Housing size mix) states that schemes should generally consist of a range of unit sizes, having regard to the requirement to deliver mixed and inclusive neighbourhoods, the need to deliver a range of unit types at different price points, the mix of uses, the range of tenures, the nature and location of the site, PTAL, the need for additional family housing and the role of one and two bed units in freeing up existing housing by providing an alternative to conversions and subdivisions, with the aim of optimising a site's potential. This should be read alongside Part 1 of the Hillingdon Local Plan, which sets out that a split of 40% smaller one and two bed dwellings and 60% larger three and four bed dwellings for all new developments would address housing need in the borough.

Taking all of the above into account, to benefit from the Fast Track Route described in Policy H5 of the London Plan and the Mayor's Viability SPG, the proposal would need to provide 35% affordable housing on-site by habitable room.

In addition to calculating affordable housing by habitable room, it would further be helpful to show the percentage by unit and floorspace, however habitable room provision would be the amount secured through a legal agreement. There is greatest demand for larger units to be provided as affordable rent (London Affordable Rent, Social rent) and smaller units to be provided as intermediate tenures (Shared Ownership, First Homes), and it is expected that that tenure split of the affordable housing be 70% affordable rent and 30% intermediate products.

Failure to provide a policy-compliant level of affordable housing would likely lead to a reason for refusal, unless it can be demonstrated through the submission of a financial viability assessment that the proposed scheme cannot afford to provide affordable housing, and there are overriding benefits which would be brought forward by the scheme to outweigh this policy conflict. Simply relying on the submission of viability information to justify a shortfall in affordable housing will not make a scheme acceptable, and even where affordable housing is shown to be unviable through a financial viability assessment, the lack of affordable housing will nonetheless weight against the proposal in the planning balance and may lead to a refusal as failing to deliver the objectives of the NPPF in promoting sustainable development.

As such, whilst set out within the submitted pre-application documents that "the provision of this will be viability tested at application stage", this would be far too late in the development process to test the scheme's viability as it is expected that the proposal delivers 35% affordable housing on-site. The viability of the scheme should be tested at the outset of the design stage as a material consideration, because if a scheme fails to provide any affordable housing then it is almost certainly not optimising the delivery of a site. In this instance, due to the cleared nature of the site, the lack of a proposed basement and the previous consent reducing the fiscal risk of future development, no abnormally high

costs are anticipated which would prevent a policy-compliant level of affordable housing from being delivered. Further discussions on affordable housing would likely be required ahead of a formal submission however the justification for providing a less-than-policy compliant level of affordable housing in this location would have to be very robust.

The proposed unit mix is described in the cover letter as being:

- 42 one-bedroom, two-person units (61%)
- 7 two-bedroom, three-person units (10%)
- 14 two-bedroom, four-person units (20%)
- 4 three-bedroom, four-person units (6%)
- 1 three-bedroom, five-person units (1.5%)
- 1 three-bedroom, six-person units (1.5%)

As described in Part 1 of the Hillingdon Local Plan, new residential development should make provision for a range of housing to meet the needs of all types of households, and highlights the importance of providing larger units, which are in the greatest demand within the borough. It is recognised that larger units have larger floorspace requirements, and therefore when measured as a percentage by unit alone do not provide a consistent picture of the amount of floorspace provided as larger family accommodation. It is also recognised that there are no specific standards for unit mixes, as each case must be assessed on its own merits taking into account site specific conditions, the suitability of the site for all types of accommodation and scheme viability, however as a general rule of thumb, a minimum of 25% of all new units must cater for larger families, unless the site is demonstrably unsuitable for families. The proportion of two-bedroom units (30%) appears broadly reasonable however the proportion of one-bedroom units (61%) is excessively high and three-bedroom units (9%) excessively low, noting the moderate PTAL, and consequently the proposed mix would not be supported. Moreover, for low-cost rent products, which should comprise 70% of the affordable housing element, there is a particularly high demand for three-bedroom units which further highlights the need for this unit size within all major residential schemes.

The supporting cover letter discusses a "precedent" having been set for smaller unit sizes in the area through "recent neighbouring developments" providing only studio, one and two-bedroom units. Notwithstanding that all applications must be assessed on their own merits, and assuming the recent developments being referred to are the office to residential prior approval applications approved for Buildings 2, 3 and 4, these can hardly be used to justify support for smaller units, as the local planning authority would not have had any control over the unit mix under the type of application applied for, which would have been entirely at the behest of the applicant at the time. As such, this does not justify a lower provision of 3+ bedrooms, especially having regard to the Hillingdon Local Plan which identifies larger units are in greatest demand across the borough.

## RESIDENTIAL DENSITY

The supporting text to Policy GG2 of the London Plan outlines that London is anticipated to experience very high levels of continued growth which will require more efficient use of land, to allow growth whilst protecting the Green Belt. As such, to get more out of limited land availability within the city, encouraging higher densities and a mix of uses in appropriate locations is required. Encouraging higher densities in appropriate locations means more people are within walking distance of local amenities and transport connections, which in turn reduces the need for private car ownership and supports the transition to a more sustainable city.

In addition, Policy D1 (London's form, character and capacity for growth) and Policy D2 (Infrastructure requirements for sustainable densities) of the London Plan both require proposals to have regard to the context of the surrounding area, including existing and proposed levels of infrastructure. Policy D2 further states that proposed densities should be proportionate to the site's connectivity and

accessibility by walking, cycling and public transport to jobs and services and sets out that where existing infrastructure capacity is insufficient to support proposed densities (including the impact of cumulative developments), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time.

Furthermore, Policy D3 of the London Plan (Optimising site capacity through the design-led approach) requires all developments to make the best use of land, by optimising a site's capacity. Optimising does not mean maximising, and a proposal should seek to respond to a site's context whilst also recognising its capacity for growth. The supporting text to Policy D3 recognises that direct comparisons between schemes using a single measure (e.g. units per hectare) can be misleading because it depends on the area included in the application site boundary and does not take into account the size of residential units or a mix of uses within one building. Nonetheless, the proposed density of a development is a relevant consideration and provides a broad picture of a scheme's suitability for a site, but it is important to measure in a number of ways.

In accordance with Policy DMHB 17 of the Hillingdon Local Plan: Development Management Policies (Residential Density), all new development should take account of the residential matrix presented in table 5.2, which sets out that an appropriate starting point for assessing appropriate densities for residential areas outside of town centres would be 50-100 units per hectare (u/ha) and 150-330 habitable rooms per hectare (hr/ha) for mostly flatted developments. Assuming a site area of approx. 0.5 hectares, for 69 flats (171 habitable rooms), this would result in a scheme with a density of 138 u/ha and 342 hr/ha. The proposed scheme would therefore be above the recommended density guidelines for this location.

The supporting text to Policy DMHB 17 further sets out that the density standards will be applied in a flexible manner, according to local circumstances, and ultimately, the design of the scheme should follow the design-led approach and residential density is just an indication of a site's optimal potential, not a determinative factor in and of itself.

## 2. Design

### URBAN DESIGN

Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, including existing and planned supporting infrastructure capacity. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 of the London Plan. In areas of comparatively low densities, incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way.

As such, proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape with due regard to building types, forms, proportions and the street hierarchy. Proposals should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings that are aligned with peoples' movement patterns and desire lines in the area, be street-based with clearly defined public and private environments, and facilitate efficient servicing and maintenance of buildings and the public realm that minimise negative impacts on the environment, public realm and vulnerable road users.

At a borough level, Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) sets out that, in order to create successful and sustainable neighbourhoods, new development (including

new buildings, alterations and extensions) should be of a high quality design which enhances the local distinctiveness of the area and contributes to a sense of place. As such. Proposals should be designed to be appropriate to the context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials.

Additionally, Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies (Design of New Development) requires all developments, including extensions and new buildings, to be designed to the highest standards by harmonising with the local context in terms of its scale, height, mass and bulk in comparison to adjacent structures, together with building plot sizes, plot coverage and the established street patterns.

The proposed block of flats is similar in scale and identical in footprint to the extant hotel permission approved in April 2020, with an additional floor proposed to be slightly set back from the main elevations. Whilst this design rationale is understood, the proposed residential use has different design requirements compared to that of a hotel (e.g. an assessment of internal accommodation standards and provision of external amenity space) which may require different design solutions in terms of layout, site coverage and orientation to achieve a high quality design whilst providing functional places for people to live.

There are no specific design concerns in respect of the layout, noting that it would respect the established building line and having regard to the extant permission, although it is queried if this really represents an optimal use of the site, with quite a large amount of land given over to car parking. Additionally, the scale of the proposal raises some concerns, and it is noted that at seven storeys, the proposal would be significantly taller than the surrounding buildings and would have to be justified as an appropriate design response in its context. This sharp drop-off in scale would be exacerbated by the lack of built form (within the Green Belt) to the east and the overall design response should seek to respect the local character.

Having regard to Policy D9 of the London Plan (Tall buildings) and Policy DMHB 10 of the Hillingdon Local Plan Part 2 (High Buildings and Structures), the proposed building would constitute a tall building, for which the only appropriate locations are within Uxbridge or Hayes Town Centres, and the current proposal would therefore conflict with Policy D9 and DMHB 10. Where a tall building is proposed, the visual, functional and environmental impacts of the proposal should be carefully considered, including the cumulative impacts with other existing, planned or consented developments in the vicinity. The supporting text to Policy D9 sets out that the higher the building, the greater the level of scrutiny that is required of its design, because of the greater potential impacts, and in this instance, a visual and townscape assessment would be required, including verified views, to establish the level of impact on short, medium and long range views.

The proposed materiality raises further concerns, with grey brickwork and metallic cladding applied fairly uniformly across the facade, which would not be in keeping with the prevailing materials in the area which is largely red brick, and occasionally yellow brick. The numerous hotels on Bath Road are of varying designs with relatively unique materials across the facade, however this contributes to their respective commercial appearances and the proposal should seek to blend in with the existing residential blocks (albeit recognising that these blocks were originally designed as offices) by using warmer brick tones and significantly reducing the amount of cladding applied to the elevations, especially facing Bath Road.

If a seven-storey building is proposed, it would be expected that the ground floor be amended to create a more clearly defined 'base', perhaps by using a different material at ground floor level (such as grey brick), which would accord with the requirement for tall buildings to have a defined top, middle and base as set out in Policy D9, noting that the top of the building would be set back to articulate it as a distinct design element. Moreover, because of the large internal cycle and bin stores, the ground floor is very poorly activated with large extents of blank frontages, with the ground floor units

themselves providing little activation because of the proposed winter gardens. The introduction of front doors directly into ground floor units would provide greater activity and would reinforce the residential character of the proposal, whilst also reducing the need for ground floor shared articulation space (hallways).

Further concern is raised in respect of the design for the south-east corner, which is shown as recessed inwards, with a secondary entrance and canopy providing access from the southern side. The proposed site plan indicates that a new path would be created through to Bath Road, which would presumably become the main pedestrian entrance for anyone arriving by foot or bus, however the proposed design and layout seeks to fix the main entrance away from Bath Road, facing towards the car park. The results in a design which fails to properly address Bath Road, with the recessed corner one of the most visible aspects of the building but which is shown as a poorly articulated blank frontage up to the top level. The creation of an entrance on both sides of the building is fully supported however the design of the southern entrance needs more consideration, and it is queried whether one larger lobby which connects through the building, with the stair and lift cores accessed from this lobby, may be a more sensible and coherent design response.

Overall, it is considered that the proposal lacks a human scale, through a combination of glazing, blank elevations and the reliance on two fairly incongruous brick and cladding colours, and the proposal as a whole appears quite dominant and imposing in its setting. There may be scope for a seven-storey building on this location however the current design exacerbates its sense of scale and measures to soften the appearance of the building are necessary. This should include a change in the colour of the brick tone but can also include other, light-touch, design measures such as horizontal banding, soldier courses or hit-and-miss brickwork to provide some articulation to the facades. The introduction of front doors would also greatly assist in providing a human scale and would further foster the creation of a residential setting.

## HERITAGE IMPACTS

The proposal is very unlikely to have an impact on any designated or non-designated heritage assets, with the only potential impact on views from within Cranford Park Conservation Area to the north-east, although the site is very far removed from the boundary. This would be picked up within any subsequent views assessment.

### 3. Amenity

Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies and Policy BE1 of the Hillingdon Local Plan: Strategic Policies both seek to ensure that new development does not adversely impact on the residential amenity of neighbouring properties.

Furthermore, the Mayor's Housing SPG sets out that proposals should limit the harm to neighbouring properties, whilst recognising that to comply with policies seeking the optimal use of land, some development proposals may be allowed even where harm has been identified.

## IMPACTS ON NATURAL LIGHT AND OUTLOOK

When assessing impacts related to the loss of natural light, the Mayor's Housing SPG advises that avoiding harm to habitable rooms is the priority, which are usually defined as any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bathrooms or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition of habitable rooms.

A standardised method of assessment for calculating the level of impact to neighbouring buildings is prescribed within the BRE's guide to good practice (June 2022). This guidance document discusses various methods of assessing a proposals impact on access to natural light, and sets out a number of thresholds which, if exceeded, would probably have a noticeable impact on natural light to

neighbouring properties. Broadly, BRE guidance recommends that an assessment considers the likely significant effects to daylight for neighbouring buildings in terms of Vertical Sky Component (VSC) and an assessment of sunlight should also be undertaken in relation to neighbouring buildings in terms of Direct Sunlight Hours and an assessment of overshadowing.

Moreover, Policy DMHB 11 states that proposal must carefully consider their layout and massing in order to ensure that the new development does not result in a significantly increased sense of enclosure or loss of outlook.

As such, any subsequent planning application would need to be accompanied by a Daylight, Sunlight and Overshadowing Assessment (DSOA), prepared by a suitably qualified specialist, which makes reference to the BRE Guidance (2022) and assesses the potential impacts to nearby buildings, including the residential flats within Status Park (Vista Court, Atlantico House, Peninsula House and Circa Apartments) and, for completeness, should also assess Nos. 33 and 35 Bath Road, opposite.

There is also a potential for a loss of outlook for the east-facing flats within Vista Court, although it is recognised that the current proposal would have an almost identical impact to the consented scheme for a hotel.

## IMPACTS ON PRIVACY

The supporting text to Policy DMHB 11 sets out that sufficient privacy for existing residents will be protected by resisting proposals which would introduce an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. To maintain existing levels of privacy, a minimum separation distance of 21 metres between facing habitable room windows will normally be required, and in some locations, for example where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary.

The western elevation of the proposal would be within 16.5 metres of the windows on the eastern elevation of Vista Court. The previous application, for a hotel, only included windows at fourth and fifth floor level, which was considered an acceptable design solution to protect the privacy of the residents of Vista Court. The current proposal includes windows at all levels across this elevation, however it is recognised that these windows serve bathrooms and hallways, and these windows could therefore be obscure glazed to prevent a loss of privacy without harming the amenity of future occupiers.

No other properties are within 21 metres of the proposed building and on this basis, the privacy of residents within other buildings should be unaffected.

## 4.

### Highways

Policy T1 of the London Plan (Strategic approach to transport) seeks development proposals to facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

In addition, Policy T2 of the London Plan (Healthy Streets) requires development proposals to demonstrate how they will reduce the dominance of vehicles on London's streets whether stationary or moving, be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

Moreover, Policy T4 of the London Plan (Assessing and mitigating transport impacts) sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required, transport assessments or statements should be submitted with proposals to ensure that impacts on the capacity of the transport network (including impacts on

pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Policy T4 further explains that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.

Developments should provide cycle parking at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Policy T6 of the London Plan (Car Parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free developments have no general parking but should still provide disabled persons parking. The maximum standards for car parking outlined in the London Plan take account of PTAL as well as London Plan spatial designations and use classes, and the supporting text further outlines that developments in town centres generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people living there.

Policy T6 makes clear that an absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets, whilst further stating that the redevelopment of sites should reflect the current approach to parking and not be re-provided at previous levels where this exceeds the maximum parking standards. In this instance, the surrounding road network includes parking controls operating from Monday to Saturday, 08:00 to 18:30, on Long Drive and Station Approach.

The maximum car parking standards, disabled persons parking, and the provision of electric or other Ultra-Low Emission vehicles are set out in Policy T6.1 to Policy T6.5, however it should be noted that for all development types in PTAL 5 or 6, or within the Central Activities Zone, proposals are expected to be car-free.

Policy T6.1 of the London Plan (Residential parking) states that new residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category. Policy T6.1 further sets out that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling should be available from the outset and these spaces must be for residents' use only (whether M4(2) or M4(3) dwellings), not be allocated to specific dwellings, unless provided within the curtilage of the dwelling, and explains that these spaces should count towards the maximum parking provision for the development. Additionally, all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20% of spaces should have active charging facilities, with passive provision for all remaining spaces.

In accordance with Policy T6.1, applying the more restrictive parking standard when a site falls into more than one category, it is considered that the application site has a PTAL of 3, which is considered

to represent a moderate level of access to public transport (on a scale of 0-6b, where 0 is the worst and 6b is the best).

In this instance, based on the unit mix described in the cover letter, the maximum residential parking standards would allow for up to 53 car parking spaces, based on 0.75 spaces for every one and two bedroom unit and 1 space for every three bedroom unit, but Policy T6 of the London Plan makes clear that the starting point for all proposals in places that are (or are planned to be) well connected by public transport should be car free, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Further regard is had to Policy H1 of the London Plan which requires the potential for housing delivery on all suitable and available brownfield sites to be optimised, especially for sites with existing or planned PTALs of 3-6, or which are located within 800m of a station or town centre boundary.

Bath Road, to the south, is a Red Route (controlled by TfL), which means that no stopping is allowed, whilst there are local parking restrictions on the nearby roads, including Nobel Drive, David Close and Caroline Place, which extend over most of Harlington, which requires residents to apply for parking permits to use the limited on-street parking which is available. Further, the site has a PTAL of 3, and whilst it is recognised that future residents would have to rely heavily on buses for shorter journeys as underground and rail stations are not easily accessible by walking, the London Plan makes clear that proposals should seek to actively reduce reliance on the private car as a main source of transport and the need to meet the maximum parking standards should not override other strategic objectives, such as the delivery of new housing (including affordable housing) from brownfield sites in sustainable locations.

Noting the parking restrictions in the area, and the moderate PTAL, it is considered that a car-lite approach could be adopted for this site, with Harlington Local centre providing relatively convenient access to local amenities within a walkable distance, and transport connections into central London and westwards, away from London, within 20 minutes by bus. Future residents would be restricted from obtaining parking permits within the borough, to be secured as a planning obligation, and most of the surrounding roads (including those south of the A4) have double yellow lines and are clearly unsuitable for on-street parking which would to certain extent be self-enforcing in preventing overspill parking from this development.

As such, 53 parking spaces would appear to be an overprovision and the large extent of area retained as car parking places further constrains on the layout of the resultant scheme and leaves practically no room for external amenity space provision which is especially disappointing (as discussed below) because of the reliance on winter gardens for all new flats, and further contributes to the sense of a car-dominated environment.

Moreover, the proposed parking layout is a contrived solution to meet the maximum standards, relying on 9 double-stacked spaces (i.e. 18 out of the 53 proposed) which would be allocated to the 9 three-bedroom units, which for these units would be an overprovision against London Plan standards, as car parking spaces are limited to a maximum of one per dwelling. Some concern is also raised in respect of the proximity of the proposed spaces to the bin stores, and whether this would prevent access on collection days if all parking spaces were occupied. Additionally, no wheelchair accessible spaces are shown on plan, and these should comprise 10% of the total number of spaces, and these have larger spatial requirements than standard parking spaces. At least 20% of spaces should have active charging facilities, with passive provision for all remaining spaces.

The parking situation is further complicated, however, as the proposed application site covers a large extent of car parking (alongside the bin store) for Vista House, which is secured by condition, and therefore any proposal would have to ensure that this does not lead to any overspill parking or prejudice any car parking that existing residents are entitled to. The previous permission, for a hotel, sought to address this issue by including Vista Court, Atlantico House and Peninsula House within the

application site so that parking for these newly converted blocks of flats was maintained at an appropriate site-wide level. In this regard, it was agreed at the time that parking should be provided at a 1:1 ratio for all consented residential units across Status Park, alongside 28 car parking spaces for the hotel, however it should be noted that this calculation of parking provision included new flats within approved roof extensions which were not implemented and have now lapsed.

Essentially, the individual permissions for the office to residential conversions secured 69 spaces for the 46 flats within Vista Court, 54 spaces for the 36 flats in Atlantico House and 68 spaces for the 45 flats within Peninsula House (significantly above a 1:1 ratio), for a combined provision of 191 spaces for 127 flats. The hotel permission sought to regularise a 1:1 parking ratio, however because the permission included parking spaces for units which were not built-out, this resulted in a higher than 1:1 ratio being secured, with 185 spaces secured by planning obligation, including 28 spaces for the hotel.

In any event, it is further noted that application reference 72408/APP/2021/1487, dated 26-07-21, amended the parking layout and provision for the new residential blocks within Status Park, securing 35 car parking spaces for Vista Court, 27 spaces for Atlantico House and 36 spaces for Peninsula House (a total of 98 residential car parking spaces), which would not have affected the approved parking layout for the hotel, but if implemented, would prevent the lawful implementation of the hotel permission because an obligation secures 185 parking spaces across Status Park. The provision of 98 car parking spaces is broadly in-line with the current London Plan standards, which would allow a maximum of 95 spaces (based on a ratio of 0.75 spaces per unit) for the combined 127 units within Vista Court, Atlantico House and Peninsula House, and it is considered that provided permission reference 72408/APP/2021/1487 can be shown to have been implemented, any subsequent re-development of the car park of Vista Court would not need to address parking for the former office buildings across Status Park.

There is a complex history across the site in respect of car parking, however, given the existing unit mix and that of the proposed site, there is a possibility to rationalise the car parking across all 4 existing and the proposed building, (if demonstrated through parking surveys and a TA), to bring the parking levels down to circa 0.6 across all buildings within the applicants ownership. This will require an appropriate red line boundary to cover all such land and the Council will also need to ensure that any existing leasees across the car park must be served the requisite notice (and civil matters pertaining to their rights dealt with separately) but a holistic approach across the site could deliver a better quality development and a sense of place for the future residents. As set out below, there is also a need to deliver public open space and this could be accommodated within the sites surplus car parking were to be landscaped and offered as high quality amenity space for the local community and future residents.,

In terms of cycle parking provision, based on 1 long-stay space for each studio unit, 1.5 spaces for each two-person unit and 2 spaces for all other units, the minimum residential long-stay cycle parking provision would be 117 cycle spaces. Separate, short-stay cycle parking should also be provided in accordance with London Plan standards.

## 5. Other

### SUSTAINABLE WASTE MANAGEMENT

Policy SI 7 (Reducing waste and supporting the circular economy) and Policy D6 (Housing quality and standards) of the London Plan require developments to be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

Additionally, Policy EM11 of the Hillingdon Local Plan Part 1 (Sustainable Waste Management) states that the council will aim to reduce the amount of waste produced in the borough. To achieve this, the council will require all new developments 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. This is

further expanded on by Policy DMHB 11 of the Hillingdon Local Plan Part 2 which requires proposals to make sufficient provision for internal and external storage space for general, recycling and organic waste, with suitable access for collection, and highlights that external bins should be located and screened to avoid nuisance and adverse visual impacts to future occupiers and neighbours.

The council's guidance for waste collection from residential properties is that waste collection distances between the proposed bin store area and a refuse vehicle should not exceed the recommended distance of 10 metres, and carrying distances to the bin store area from each residential unit should not exceed a distance of 30 metres.

The proposed site layout has the bin stores opening outwards towards the car park, and this location raises a number of concerns, both in terms of its convenience for future residents (should be within 30 metres of their front doors) and in terms of convenient for waste operatives, due to its location close to the proposed car parking spaces. Some concerns are raised that on collection days, if all the parking spaces were occupied, there would be insufficient room to allow access.

## QUALITY OF ACCOMMODATION

Policy D3 of the London Plan states that proposals should deliver appropriate outlook, privacy and amenity, provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity, help prevent or mitigate the impacts of noise and poor air quality, and achieve indoor and outdoor environments that are comfortable and inviting for people to use.

Policy D6 of the London Plan (Housing quality and standards) requires all new residential properties to meet the minimum space standards and further states that the minimum floor to ceiling height must be 2.5m for at least 75 % of the Gross Internal Area (GIA) of each dwelling to avoid overheating and generally improve living conditions. In addition, the design of new residential development should be high-quality and should provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

Moreover, proposals should maximise the provision of dual aspect dwellings (dwellings with openable windows on two external walls) and normally avoid the provision of single aspect dwellings. Dual aspect dwellings have many inherent benefits including better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation and a greater capacity to address overheating. Dual aspect dwellings also offer a better choice of views, access to a quiet side of the building, and greater flexibility in the use of rooms. A single aspect dwelling should only be provided where it is considered a more appropriate design solution as a result of site constraints which would mean dual aspect dwellings would severely restrict optimising the site's potential. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

Furthermore, Policy D6 of the London Plan and Standard 26 of the Mayor's London Housing SPG sets out that a minimum of 5 sqm of private outdoor open space should be provided for 1-2 person dwellings, with an additional 1 sqm provided for each additional occupant, and it must achieve a minimum width and depth of 1.5 metres to be functional and fit for purpose. As such, a 3-person dwelling should include 6 sqm of external private amenity space, a 4-person dwelling should include 7 sqm, a 5-person dwelling should include 8 sqm and so on. Also of relevance, Policy DMHB 18 of the Hillingdon Local Plan (Private Outdoor Amenity Space) requires good quality and usable private outdoor amenity space for all new residential developments. Studio and one-bedroom flats, two-bedroom flats and 3+ bedroom flats should provide 20, 25 and 30 sqm of on-site amenity space respectively. Policy DMHB 18 also sets very high standards for private amenity space of 40, 60 and 100 sqm for 1, 2, and 3+ bedroom houses respectively. Dwellings on upper floors should all have access to a private balcony or terrace, where this is consistent with the overall design of the building

whereas houses and ground floor flats should have private gardens.

It would be expected that all proposed dwellings meet the minimum internal space standards and each unit is provided with private amenity space. It is recognised that achieving Hillingdon's Local Plan standards for external amenity space provision may be difficult to achieve for each unit, and in such instances, it would be expected that the overall combined shortfall be provided as communal amenity space instead.

As discussed in our meeting, the proposed layout essentially seeks to turn its back on the main sources of noise and air pollution; Bath Road immediately to the south and the operation of Heathrow Airport beyond that, to protect the amenity of future occupiers. Whilst this design rationale is understood, the resultant layout of units is poor, and the development would fail to provide a satisfactory quality of accommodation for the majority of residents as a result. There are numerous single-aspect dwellings shown across all floors, comprising 52% of the total number, which is unacceptable, even recognising that the layout is a design response to other environmental constraints. This includes single-aspect north-facing units across the ground to fifth floor, and design guidance is clear that single-aspect units will only be accepted where design constraints prevent any other option, and even then, two and three bedroom flats with only one aspect will likely be unacceptable.

Single-aspect dwellings are generally more difficult to ventilate naturally, more likely to overheat, receive natural light for less of the day and offer poorer outlook than dual or triple aspect dwellings. For the proposed scheme, particular concern is raised in respect of both the number of south-facing single-aspect units overlooking Bath Road and the number of single-aspect units overlooking the car park, which, despite being in the same block, will experience very different issues following completion.

It is likely that the south-facing single-aspect units will receive good levels of natural light, however this has the potential to lead to overheating, which in turn will have to be dealt with by mechanical ventilation, as the noise and air quality constraints of Bath Road and Heathrow may mean that south-facing windows are not openable. On the other hand, the single-aspect units facing northwards will likely receive very little light, especially the lower floors, as direct sunlight will be blocked by the proposed development and diffuse daylight will probably be low. In the context of the updated BRE guidance for daylight and sunlight (June 2022), which has more stringent targets for internal daylight and sunlight levels than the previous guidance, this design constraint will need to be considered carefully. The proposed layout also fails to provide good quality circulation areas, with an over-reliance on double-loaded internal corridors would not be well lit by natural light or be naturally ventilated, and this further highlights the relatively poor quality of accommodation which would be achieved from this development.

Private amenity space is proposed as winter gardens for all units on all floors, presumably because noise constraints would mean that balconies would not provide a good level of amenity. This would need to be demonstrated through the submission of a noise survey, as at present, the scheme does not include any external amenity space, which is preferable to enclosed spaces in the form of winter gardens. It may be possible to introduce external balconies (or recessed balconies) within the northern elevations as the noise profile may be quieter on this side following completion, however it is recognised that external amenity areas may be unfeasible. In any event, the proposal would need to provide some on-site communal amenity space, to offset the under-provision against Hillingdon Local Plan standards, and it is suggested that this be incorporated in place of the proposed parking area in some capacity.

## PLAY SPACE

Policy DMHB 19 of the Hillingdon Local Plan: Development Management Policies (Play Space)

requires major residential development to provide children and young people's play facilities on-site, using the GLA's child yield calculator to determine the levels of occupancy by different age groups. Where a satisfactory level of provision for children and young people's play facilities cannot be achieved on-site, the Council will seek a financial contribution towards the improvement of existing children and young people's play facilities within the local area, which would be secured through a legal agreement.

## DISABLED ACCESS

Policy D5 of the London Plan (Inclusive design) sets out that proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building, and proposals should ensure they are compliant with Policy D12 of the Plan (Fire safety) and place fire resilience central to the proposal's design.

Additionally, to provide suitable housing and genuine choice for London's diverse population, including disabled people and families with young children, Policy D7 of the London Plan (Accessible housing) states that all residential development should include at least 10% of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

At a borough level, Policy BE1 of the Hillingdon Local Plan: Part 1 (Built Environment) and Policy DMHB 16 of the Hillingdon Local Plan Part 2 (Housing Standards) require 10% of new dwellings to be wheelchair accessible, encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives. In addition, all proposals should incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services. It should be further noted that M4(3) units should be evenly distributed across tenures and housing types, and that 10% of the affordable housing units should be M4(3) units, suitable for 'day one occupation' by a wheelchair user.

In practice, this means the new developments have to consider where accessible and adaptable units would be located and how they would function at a very early stage of the design process to ensure that the specific requirements of achieving the relevant standards can feasibly be met within the proposed layout.

## ECOLOGY AND TREES

Policy G5 of the London Plan (Urban Greening) states that major developments should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The Mayor recommends that boroughs seek an Urban Greening Factor (UGF) target score of 0.4 for developments that are predominately residential. In broad terms, the UGF is an assessment of the amount, type and value of natural environment provided on site as a proportion of the overall site area. The assessment assigns each landscape type (e.g. Semi-natural vegetation, intensive green roof to depth of 150mm, extensive green roof to depth of 80mm, amenity grassland, etc) with a 'factor' (1, 0.8, 0.7 and 0.4 respectively for the landscapes listed above). These factors are a simplified measure of various benefits provided by soils, vegetation and

water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaption and biodiversity conservation.

Policy EM4 of the Hillingdon Local Plan: Strategic Policies (Open Space and Informal Recreation) states that the network of open spaces will be safeguarded, enhanced and extended, recognising their role in serving local communities and encouraging active lifestyles by providing spaces within walking distance of homes. There will be a presumption against any net loss of open space in the Borough and major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities.

Moreover, the council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) for the benefit of wildlife and a healthier lifestyle.

In addition, Policy DMHB 14 of the Hillingdon Local Plan Part 2: Development Management Policies (Trees and Landscaping) sets out that all developments will be expected to retain or enhance biodiversity through the protection of existing landscaping, trees and other natural features of merit, and proposals are required to provide a scheme of hard and soft landscaping to demonstrate this.

Furthermore, Policy EM7 of the Hillingdon Local Plan: Strategic Policies (Biodiversity and Geological Conservation) seeks to protect biodiversity features from inappropriate development, and encourages the provision of biodiversity improvements from all developments, including green roofs and walls where feasible.

As a purely residential development, the proposal would be expected to achieve a UGF score of at least 0.4, as well as demonstrating biodiversity net gain, to comply with the requirements of the London Plan and the Hillingdon Local Plan respectively. Whilst the site is not within a Conservation Area or area covered by a TPO, the council will resist the loss of any established trees and biodiversity features across the site, although there don't appear to be any. A Tree Survey, alongside an Arboricultural Impact Assessment and Arboricultural Method Statement to determine the extent of works to trees would be required at the point of submission (unless no trees would be lost) and any subsequent application should be accompanied by a Biodiversity Enhancement and Management Plan, alongside a UGF Plan, to demonstrate compliance with the above policies.

## CONTAMINATION

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) states that the council expects proposals for development on contaminated land to provide mitigation strategies that will reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill.

The are known contaminants present on the site and the site may require remediation prior to its use for residential purposes because it is within 250 metres of four historic landfill sites there is a potential risk from migrating landfill gas. Additionally, the use of the site as a car park may have introduced significant quantities of unspecified materials which would now constitute made ground requiring detailed consideration.

As such, in the first instance, a desktop study to investigate potential contaminants should be carried out. This should consider whether contamination may have spread beyond the boundaries of the proposed development site and other nearby site boundaries and that a wider search area may require assessment, treatment and/or monitoring, to ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems. After that, a site investigation, including soil, gas, surface water and

groundwater sampling, together with the results of the analysis and a risk assessment would be required, followed by a scheme of remediation and verification of the works undertaken.

## ENERGY

Policy SI 2 of the London Plan (Minimising greenhouse gas emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy, placing an additional requirement to monitor emissions beyond implementation to determine the effectiveness of the mitigation:

- 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.

Policy SI 2 sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013.

Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and how a minimum on-site reduction of at least 35% beyond Building Regulations will be achieved. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures alone. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site, provided that an alternative proposal is identified and delivery is certain.

Moreover, major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations (i.e. unregulated emissions).

In addition, Policy SI 3 of the London Plan (Energy Infrastructure) states that all major development proposals shall explore opportunities to maximise the use of on-site renewable energy generation and incorporate demand-side response measures.

Policy EM1 of the Hillingdon Local Plan: Strategic Policies (Climate Change Adaptation and Mitigation) sets out that the installation of renewable energy will be encouraged for all new developments.

Furthermore, all new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate, and for residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day.

## AIR QUALITY

Policy SI 1 of the London Plan (Improving air quality) states that proposals should not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, so as not to create unacceptable risk of high levels of exposure to poor air quality.

As such, as a minimum, proposals should be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution, whilst making provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

The development is located within an Air Quality Management Area and within the A4 Corridor Air Quality Focus Areas. Focus Areas are defined as places where the pollution levels are already elevated and therefore improvements are required. As such, the proposed development will need to be Air Quality Positive.

Major development proposals must be submitted with an Air Quality Assessment to demonstrate compliance with air quality objectives and show that the proposal includes sufficient mitigation measures to ensure that the demolition, construction and operational phases do not impact on nearby receptors. This includes both existing residents and those which would be introduced by the development.

The Air Quality Assessment should further demonstrate that the demolition and construction phases are carried out in accordance with the Mayor of London's Control of Dust and Emissions SPG, including the use of NRMM compliant machinery, and that the design aspects have been assessed to provide a clean development. For example, the use of Ultra Low NOx technologies and low/zero emissions technologies for energy, low/zero technologies for associated traffic, and protection of receptors from pollution sources such as road traffic/emissions or from flues. Given the location of this development, transport impacts should not be screened out without prior agreement with the local authority. The accompanying transport assessment should include figures on trip generation and modal split to allow for a proper assessment of the air quality impacts of the associated traffic.

Where, after appropriate on-site mitigation measures have been incorporated, any remaining development emissions will be required to be offset as a financial contribution to support off-site measures to improve air quality. The pollution damage costs associated with the emissions from the development will inform the degree of mitigation that is required.

## NOISE

Policy D14 of the London Plan (Noise) states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances with necessary and appropriate provisions including ongoing and future management responsibilities, and proposals should seek to separate new noise-sensitive development from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

Policy D13 of the London Plan (Agent of Change) sets out that proposals should mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and promoting appropriate soundscapes. Proposals should first seek to separate new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials, in preference to sole reliance on sound insulation. Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles, promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

It is generally accepted that noise emanating from residential properties is lower than commercial

premises, and industrial uses are associated with the highest noise profile.

Policy EM8 of the Hillingdon Local Plan: Strategic Policies (Land, Water, Air and Noise) states the council will promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected by new developments. As such, the council will seek to ensure that noise sensitive development and noise generating development are only allowed if noise impacts can be adequately controlled and mitigated.

As discussed above, the design and layout of the proposal have clearly been influenced by the noise constraints of Bath Road and Heathrow to the south. It should be clearly set out with any subsequent application, within a Noise Impact Assessment, that the noise constraints of the site have been surveyed, and that appropriate mitigation can be used to ensure that internal rooms and external amenity space achieve satisfactory noise conditions throughout all times of the day (and night).

## FLOODING AND DRAINAGE

Policy SI 12 of the London Plan (Flood risk management) sets out that flood risk across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities and developers where relevant. Proposals should further 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. Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading.

In addition, Policy SI 13 of the London Plan (Sustainable drainage) sets out that proposal should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Moreover, drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

Policy EM6 of the Hillingdon Local Plan: Strategic Policies (Flood Risk Management) encourages development to be sited away from the areas of highest flood risk (Flood Zones 2 and 3), and all development will be required to use sustainable urban drainage systems (SUDS).

Policy EM6 of the Hillingdon Local Plan: Strategic Policies (Flood Risk Management) encourages development to be sited away from the areas of highest flood risk (Flood Zones 2 and 3), and all development will be required to use sustainable urban drainage systems (SUDS).

The application site lies within Flood Risk Zone 1 but is known to suffer from surface-water flooding, and in any event, as a major application, any subsequent application should be accompanied by a Flood Risk Assessment and a Drainage Strategy, utilising SuDS where possible.

## OPEN SPACE

Policy G4 of the London Plan (Open space) promotes the creation of new areas of publicly-accessible open space, particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change or areas of deficiency. Additionally, Policy EM4 of the Hillingdon Local Plan Part 1 (Open Space and Informal Recreation) and Policy DMCI 4 of the Hillingdon Local Plan Part 2 (Open Spaces in New Development) both support the provision of new open space in major developments, or improvements to existing open spaces. Proposals for major new residential development that fail to make provision for new or enhanced open space, or which would result in open space that is inappropriate in type, quality or location, will be resisted. The

creation of new open space is to be encouraged wherever practical, although it is recognised that creation of new open spaces may be limited in densely populated areas or because of financial constraints, and in such circumstances, major residential proposals are expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities off-site.

New major developments are expected to be sited so that a small or local level open space is within 400 metres, a district level open space is within 1200 metres and a metropolitan open space is within 3200 metres.

This approach is confirmed in the Planning Obligations SPD, which sets out that for schemes of 15 or more residential units where an on-site solution cannot be found, a financial contribution based on the following formula would be sought:

Contribution = (Build Costs + On-costs) x ( - Existing Capacity)

In line with Para 9.15 of the Planning Obligations SPD, Build Costs are £20 and On-costs are £5, in conjunction with advice from the Council's Green Spaces Team, and the Standard Provision per person is 20 sqm (based on a provision of 2 hectares of unrestricted recreational open space per 1,000 people). Occupancy of Development is calculated by multiplying the number of units by 2.67 (the average occupancy rate per home within the borough). Existing Capacity is 0, in line with Para 9.17 of the Planning Obligations SPD, as there is no known existing spare capacity for public open space in the area and is why the contribution is being sought.

It is encouraged (as set out above) to investigate providing public open space within the wider site on land which currently accommodates surplus parking, adjacent to the green belt.

## FIRE SAFETY

Policy D12 of the London Plan (Fire safety) requires all development to achieve the highest standards of fire safety. To achieve this, new developments must ensure that they identify suitably positioned unobstructed outside space for fire appliances to be positioned on, appropriate space for use as an evacuation assembly point, and are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire. These should include appropriate fire alarm systems and passive and active fire safety measures, and the buildings should be constructed in an appropriate way to minimise the risk of fire spread, whilst providing suitable and convenient means of escape. Additionally, proposals should provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. A Fire Statement, which should include a robust strategy for evacuation, and should be produced by a third party, suitably qualified assessor should be submitted alongside any subsequent planning application in accordance with Building Regulations (Fire Safety: Document B), which can be periodically updated and published so that all building users can have confidence in it.

It should be highlighted that in circumstances where a fire tender cannot, for whatever reason, gain access to part of a site envelope, Building Regulations (Fire Safety: Document B) makes allowance for this scenario by stipulating that fire appliances should be able to be positioned within 45 metres of the source of an emergency in order to execute their duty. If this distance is exceeded then alternative options such as hydrants and and/or internal water sprinkler systems can be applied in lieu of a fire tender accessing a site thereby covering all eventualities.

## 6. Planning Obligation and CIL (Mayor and LBH)

Policy DMCI 7 of the Hillingdon Local Plan: Development Management Policies (Planning Obligations and Community Infrastructure Levy) sets out that planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it, to ensure that development is sustainable in accordance with the NPPF (2021). Infrastructure

requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL) and through planning obligations.

Specifically, planning obligations are used to secure the provision of affordable housing in relation to residential development schemes, and where a development has infrastructure needs that are not addressed through CIL to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Applications which fail to include appropriate planning obligations to make the proposal acceptable will be refused. Planning obligations run with the land, are legally binding and enforceable.

Community Infrastructure Levy (CIL) would be applied to the proposal.

Some planning obligations would likely be needed to mitigate the proposal in addition to CIL. The need for, and level of obligations would depend on the scale of any subsequent application, together with the level of on-site measures achieved to meet the various policy requirements. It is likely that the following obligations would be sought:

- Secure affordable housing provision
- Carbon offsetting contribution
- Air quality offsetting contribution
- Open space contribution
- Play space contribution
- Parking permit restrictions
- Travel Plan
- Active travel measures
- HUDU health contribution
- Construction and Employment Training Scheme

## 7. Application Submission

It is strongly recommended that the applicant enters into a PPA as it is considered that the site has development potential however determining the optimal capacity of the site is likely to require considerable time and effort, and the local planning authority needs to ensure the correct resources are in place to determine any subsequent application. If a PPA is not sought, then as a minimum, the applicant is advised to submit a follow-up pre-app, so that the local planning authority can comment further on whether any amendments have addressed our initial concerns.

For completeness, the following documents will be required at the point of submission, alongside the correct fee, to allow the proposal to be validated. Failure to submit one of the requested documents will result in a delay to the validation process, which will in turn lead to a delay in the date of determination.

Plans:

- Site Location Plan - Must be at a scale of 1:1250, and should show the application site edged in red, with any land owned by the applicant but not within the application site edged in blue. The red line should cover the full extent of the application site up to the edge of the public highway. The site location plan should include the name of at least three roads (including the application road), should include street numbers if possible and should indicate the direction of north.
- Block Plan
- Existing and Proposed Site Layout Plans
- Existing and Proposed Floorplans (including roofplans)
- Existing and Proposed Elevations
- Existing and Proposed Sections
- Existing and Proposed Streetscene Elevations
- Site Plan showing the dimensions of all carriageway and footway widths, parking bays, visibility

splays, alongside the location of cycle stands, disabled parking, electric vehicle charging points, and refuse storage.

- UGF Plan (including calculations)
- Proposed s278 Works Plan

Documents:

- Application Form (including the completed Certificate of Ownership)
- Accessibility Statement
- Accommodation Schedule
- Affordable Housing Statement (or Financial Viability Assessment)
- Air Quality Assessment (inc. Air Quality Neutral Assessment)
- Arboricultural Impact Assessment
- Arboricultural Method Statement
- Biodiversity Enhancement and Management Plan (inc. a calculation of the proposed UGF)
- CIL additional information form
- Construction Management Plan and Demolition Management Plan
- Contaminated Land Survey
- Daylight and Sunlight Analysis - This should include an assessment of neighbouring properties and an assessment of access to natural light within the proposed dwellings
- Design and Access Statement
- Energy Strategy
- External Lighting Details
- Flood Risk Assessment and SuDs Report
- Landscape Strategy
- Materials Schedule
- Noise Impact Assessment
- Overheating Assessment
- Parking Design and Management Plan
- Planning Statement (including an assessment against London Plan and Hillingdon Local Plan policies)
- Statement of Community Involvement (inc. details of public consultation carried out by the applicant)
- Transport Assessment (inc. Swept Path Analysis and Active Travel Zone Assessment)
- Travel Plan
- Tree Survey
- Utilities Survey and Proposals
- Waste Management Plan

8. Conclusion

The proposed development is acceptable in land use terms, and would make efficient use of a brownfield site to deliver additional homes in a sustainable location in accordance with the general growth principles of the NPPF, London Plan and Hillingdon Local Plan, however this is subject to parking for Vista Court being appropriately re-provided (as per approved application reference 72408/APP/2021/1487) and a policy-compliant level of affordable housing being provided.

Moreover, whilst the rationale for the current layout and design is understood, there are significant concerns in respect of the quality of the proposed accommodation which will need to be carefully considered to ensure the competing constraints (natural light, noise, air quality, overheating) are resolved holistically. Adhering to the previously approved layout for a hotel use is not necessarily the optimal use of the site for the proposed residential uses, and it is recommended that the applicant explore whether alternative layouts make better use of the land, including whether a reduction in car parking provision can be justified, as the amount of parking proposed affects the amount of buildable area and potential external amenity space.

**Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible,**

in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**Andrew Thornley**  
Principal Planning Officer  
Major Applications Team  
London Borough of Hillingdon

#### Planning Guarantee

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined in a site by site basis.

**Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.**